

1 TOMAS E. MARGAIN, Bar No. 193555
 HUY TRAN, Bar No. 288196
 2 Justice at Work Law Group
 84 West Santa Clara Street, Suite 790
 3 San Jose, CA 95113
 Telephone: (408) 317-1100
 4 Facsimile: (408) 351-0105
 Tomas@JAWLawGroup.com
 5 Huy@JAWLawGroup.com

6 Attorneys for Plaintiff
 J. LEONIDAS CAMACHO

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA

10 J. LEONIDAS CAMACHO,
 11 Plaintiff,

Case No. 15-cv-05141-KAW

12 v.

**NOTICE OF DISMISSAL WITH
 PREJUDICE; REQUEST THAT MATTER
 BE DISMISSED AND THAT CLERK
 CLOSE FILE; [~~PROPOSED~~] ORDER**

13 K.J. WOODS CONSTRUCTION, INC;
 14 KIERAN JOSEPH WOODS dba WOODS
 CONSTRUCTION,

15 Defendants. _____
 16

Complaint Filed: February 03, 2015

17
 18 TO THE COURT AND ALL PARTIES TO THIS ACTION:

19 NOTICE IS HEREBY given that Plaintiff J. LEONIDAS CAMACHO hereby requests that
 20 all Defendants K.J. WOODS CONSTRUCTION, INC; KIERAN JOSEPH WOODS dba WOODS
 21 CONSTRUCTION be Dismissed **with prejudice**. This notice is accompanied by the declaration of
 22 counsel and proposed order.
 23
 24
 25
 26
 27
 28

1 Dated: March 25, 2016

2
3 //s//Tomas E. Margain//s//
4 Tomas E. Margain
5 Huy Tran
6 JUSTICE AT WORK LAW GROUP
7 Attorneys for Plaintiff
8 J. LEONIDAS CAMACHO

9
10 **DECLARATION OF TOMAS E. MARGAIN**

11 I, Tomas E. Margain, declare as follows:

12 1. I am the attorney of record for Plaintiff J. LEONIDAS CAMACHO in this case. I
13 have personal knowledge of the facts set forth in this declaration, and, if called as a witness, I could
14 and would testify thereto.

15 2. Plaintiff has consented to have a Magistrate hear his case. See Docket 5.

16 3. After being sued, Defendants hired the firm of Leonidou & Rosin, APC to represent
17 them. I was able to settle my client's dispute over the course of several negotiations conferences
18 with Caitlin Kaufman an attorney admitted to this Court after exchanging documents.

19 4. The matter was settled prior to Defendants entering an appearance and as such I
20 cannot submit a stipulation and order to Dismiss with prejudice.

21 5. I have the authority of my client to have this case Dismissed with Prejudice.

22 I declare under penalty of perjury pursuant to the laws of the United States that the foregoing
23 is true and correct, executed on March 25, 2016 in San Jose, California.

24 //s// Tomas Margain
25 Tomas E. Margain

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Based on GOOD CAUSE shown and upon the Notice and Declaration of Plaintiff's counsel Tomas E. Margain, the Court orders as follows:

The matter is Dismissed with Prejudice. All calendared dates are hereby vacated and the Clerk is directed to close the file.

IT IS SO ORDERED.

DATED: 3/30/16

By: *Kandis Westmore*
THE HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge