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 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
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13 LADAN KEYHAN,
 14 Plaintiffs,
 15 vs.
 16 KOHLER CO.; and DOES 1 through 25,
 inclusive,
 17 Defendants.
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Case No.: 4:15-cv-05555-PJH

**STIPULATION AND [PROPOSED]
 ORDER FOR DISMISSAL WITH
 PREJUDICE OF ACTION AND ALL
 CAUSES OF ACTION PLED THEREIN
 PURSUANT TO SETTLEMENT**

[Fed. R. Civ. P. 41(a)(2)]

State Action Filed: November 3, 2015
 Trial Date: July 24, 2017

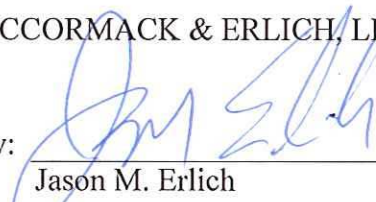
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1 Pursuant to Federal Rule of Civil Procedure 41(a)(2), and subject to the Court's approval,
2 Plaintiff Ladan Keyhan and Defendant Kohler Co. (collectively the "Parties"), through their
3 respective counsel, hereby stipulate and mutually request that the Court enter an order dismissing
4 the above-captioned action and all causes pled therein with prejudice, including, without limitation,
5 Plaintiff's claims alleging violation of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. section
6 201, *et seq.*, pursuant to the Parties' settlement, with each Party to bear all of her or its own
7 attorney's fees and costs.

8 IT IS SO STIPULATED.

9
10 DATED: July 14 June 14, 2016

MCCORMACK & ERLICH, LLP

By: 
Jason M. Erlich

Attorneys for Plaintiff
LADAN KEYHAN

16 DATED: July 21, 2016

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/
Michael N. Westheimer
Rachel J. Moroski

Attorneys for Defendant
KOHLER CO.

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ORDER

Pursuant to the stipulation of the parties, and good cause appearing, the Court approves the dismissal of the action and all causes pled therein with prejudice, including without limitation the claims alleging violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. section 201, *et seq.*, pursuant to the Parties’ settlement. The action is dismissed in its entirety with prejudice. Each Party shall bear all of her or its own attorney’s fees and costs. The clerk shall close the file.

IT IS SO ORDERED.

Dated: July 21 _____, 2016

Honorable Phyllis J. Hamilton
Judge, U.S. District Court
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
IT IS SO ORDERED
Phyllis J. Hamilton
Judge Phyllis J. Hamilton