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17	The Procter & Gamble Co.			
18	UNITED STATES DISTRICT COURT			
	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION			
19	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION			
20				
21	GREGORY JOHNSON, on behalf of himself and all other similarly situated individuals,	Case No. 3:16-cv-02302		
22	Plaintiff,	JOINT STIPULATION TO DISMISS WITHOUT PREJUDICE PURSUANT TO		
23	v.	FED. R. CIV. P. 41(A)(1)(A)(ii)		
24	THE PROCTER & GAMBLE CO.,	Judge: Honorable Phyllis J. Hamilton		
25	Defendant.	Complaint filed: April 27, 2016		
26	Derendant.			
27				
28				
SQUIRE PATTON BOGGS (US) LLP	CDM DDODUCTSUSE/22201			
Attorneys at Law San Francisco	CBM-PRODUCTS\SF682391-1 JOINT STIPULATION TO DISMISS WITHOUT PRE	Case No. 3:16-cv-02302 JUDICE PURSUANT TO FED. R. CIV. P. 41(A)(1)(A)(ii)		
Dockets.Justia.co				

1	Plaintiff Gregory Johnson ("Plaintiff") and Defendant The Procter & Gamble Co.			
2	("Defendant") (together, the "Parties"), by and through their undersigned counsel, hereby stipulate			
3	and agree pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) to the dismissal of Plaintiff's			
4	claims in this action without prejudice.			
5	NOW THEREFORE, IT IS HEREBY STIPULATED and AGREED:			
6	1) Plaintiff's claims against Defendant in this action shall be dismissed without prejudice;			
7	2) The Parties agree this dismissal does not prejudice Plaintiff's right to refile in the United			
8	States District Court for the Southern District of Ohio;			
9	3) The Parties further agree that this dismissal does not waive Defendant's right to seek			
10	intra-district reassignment in that jurisdiction should Plaintiff refile his complaint there; and			
11	3) Each party shall bear its own costs.			
12	IT IS SO STIPULATED.			
13	Dated: June 15, 2016	Respectfull	y submitted,	
14				
15		GIRARD (GIBBS LLP	
16		By	/s/ Daniel C. Girard	
17		Attorneys fo	DANIEL C. GIRARD	
18			JOHNSON	
19	Dated: June 15, 2016	SQUIRE P	ATTON BOGGS (US) LLP	
20		By	/s/ Eric J. Knapp	
21			ERIC J. KNAPP	
22			or Defendant TOR & GAMBLE CO.	
23	Pursuant to Local Rule 5-1(i)(3), the filer of the document attests that concurrence in the filing of			
24	the document has been obtained from each of the other Signatories.			
25	PURSUANT TO STIPULATION	, IT IS SO ORI	DERED:	
26	Dated: June 16, 2016		ALTES DISTRICT CA	
27			District of UT IS SO ORDERED	
28		United State	es District Ju Judge Phyllis J. Hamilton	
>	CBM-PRODUCTS\SF682391-1	2	DISTRIC C See No. 3:16-cv-02302	
		-2- UT PREJUDICE P	URSUANT TO FED. R. CIV. P. 41(A)(1)(A)(ii)	

SQUIRE PATTON BOGGS (US) LLP Attorneys at Law SAN FRANCISCO

JOINT STIPULATION TO DISMISS WITHOUT PREJUDICE PURSUANT TO FED. R. CIV. P. 41(A)(1)(A)(ii)