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20 NATIONWIDE INSURANCE COMPANY
21 OF AMERICA

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 OAKLAND DIVISION

25 TIMOTHY LAVALLIS,
26 Plaintiff,
27 vs.
28 NATIONWIDE INSURANCE COMPANY
OF AMERICA, and DOES 1 through 10,
inclusive,
Defendants.

Case No. 4:16-cv-05912-DMR
**STIPULATION FOR DISMISSAL
AND ~~[PROPOSED]~~ ORDER**
Honorable Donna M. Ryu

29 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby stipulate
30 that this action shall be DISMISSED in its entirety WITH PREJUDICE, with each side bearing
31 its own fees and costs. However, the parties further agree that this stipulation and dismissal shall

1 not impair in any way Nationwide's ability to claim and recover restitution in connection with
2 any criminal action involving plaintiff.

3 IT IS SO STIPULATED.

4
5 Dated: December 6, 2019

THE ORR FIRM

6
7 By /s/ WYKEISHA L. ORR
WYKEISHA L. ORR

8 Attorneys for Plaintiff
9 TIMOTHY LAVALLIS

10 Dated: December 6, 2019

DENTONS US LLP

11
12 By /s/ SONIA MARTIN
SONIA MARTIN

13 Attorneys for Defendant
14 NATIONWIDE INSURANCE COMPANY
15 OF AMERICA

16
17 **FILER'S ATTESTATION:**

18 Pursuant to Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that
19 the concurrence in the filing of this document has been obtained from its signatories.

20 Dated: December 6, 2019

By /s/ SONIA MARTIN
SONIA MARTIN

21
22 **IT IS SO ORDERED.**

23
24 Dated: Dec. 6, 2019

