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5 Attorney for Plaintiff,  
 JEANNIE GONZALES

7 UNITED STATES DISTRICT COURT  
 8 NORTHERN DISTRICT OF CALIFORNIA  
 9 OAKLAND

10 JEANNIE GONZALES, an individual,  
 11  
 12 Plaintiff,

13 vs.

14 LABORATORY CORPORATION OF  
 AMERICA HOLDINGS, a Delaware  
 Corporation; and DOES 1–50,  
 15  
 16 Defendants.

Case No. 4:16-cv-07346-HSG

[Assigned to the Hon. Judge Haywood S. Gilliam]

**STIPULATION OF CONDITIONAL  
 DISMISSAL AND [~~PROPOSED~~] ORDER**

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1           WHEREAS, on June 1, 2018, Plaintiff JEANNIE GONZALES (“Plaintiff”) and Defendant  
2 LABORATORY CORPORATION OF AMERICA HOLDINGS (“Defendant”) fully executed a  
3 Confidential Settlement, Waiver, and Release Agreement (“Agreement”) that will not be fully  
4 performed until thirty-five (35) days from the date of the Agreement;  
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6           WHEREAS, the parties wish to dismiss the action upon completion of the thirty-five (35) day  
7 period, conditioned upon the satisfaction of all conditions that need to be satisfied under the  
8 Agreement;

9           WHEREAS, on May 29, 2018, the Court ordered the parties to file pre-trial documents or a  
10 Stipulated Dismissal on or before June 1, 2018;

11           NOW, THEREFORE,

12           1.       Pursuant to the terms set forth below, Jeannie Gonzales and Laboratory  
13 Corporation of America Holdings, by and through their respective attorneys of record, hereby  
14 stipulate to conditionally dismiss all of the claims in this action;  
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16           2.       This dismissal is subject to satisfaction in full of all conditions precedent to  
17 dismissal set forth in the Agreement;

18           3.       During the thirty-five (35) day period and while this conditional dismissal is in  
19 effect, the June 11, 2018 trial is vacated; and  
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21           4.       Once the thirty-five (35) day period has passed and the conditions precedent to  
22 dismissal have been satisfied, the parties shall file a stipulation of dismissal, pursuant to  
23 Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and this conditional dismissal shall become a  
24 final dismissal with prejudice, each side to bear its own costs and attorneys’ fees.  
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LAW OFFICES OF ERIC M. LIGHTMAN

Dated: June 1, 2018

By: /s/ Eric M. Lightman  
Eric Lightman  
Attorney for Plaintiff  
JEANNIE GONZALES

K&L GATES LLP


Dated: June 1, 2018

By: /s/ Christopher K. Kondon  
Christopher J. Kondon  
Saman M. Rejali  
Kate G. Hummel

Attorneys for Defendant  
LABORATORY CORPORATION OF  
AMERICA HOLDINGS

**PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.**

Dated: 6/4/2018

  
Honorable Haywood S. Gilliam, Jr.  
United States District Judge