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5 Attorney for Plaintiff,  
 6 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  
 15 AMERICA HOLDINGS, a Delaware  
 Corporation; and DOES 1-50,  
 16 Defendants.

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

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

**STIPULATION FOR DISMISSAL WITH  
 PREJUDICE PURSUANT TO FED. R. CIV.  
 P. 41(a)(1)(A)(ii) 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 would not be fully  
4 performed until thirty-five (35) days from the date of the Agreement;

5           WHEREAS, on June 1, 2018, the parties filed a Stipulation With Proposed Order for  
6 Conditional Dismissal subject to the subject to satisfaction in full of all conditions precedent to  
7 dismissal set forth in the Agreement;

8           WHEREAS, on June 4, 2018, this Court ordered that once the thirty-five (35) day period has  
9 passed and the conditions precedent to dismissal have been satisfied, the parties shall file a stipulation  
10 of dismissal, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and this conditional  
11 dismissal shall become a final dismissal with prejudice, each side to bear its own costs and attorneys’  
12 fees filed a Stipulation With Proposed Order for Conditional Dismissal;

13           WHEREAS all the conditions precedent to dismissal have been satisfied under the  
14 Agreement;

15           IT IS HEREBY STIPULATED AND AGREED by and between the parties to this action,  
16 through their respective attorneys, that pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil  
17 Procedure, this action, and all claims asserted herein by Plaintiff against Defendant, be dismissed  
18 with prejudice, each party to bear its own costs and attorneys’ fees.  
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LAW OFFICES OF ERIC M. LIGHTMAN

Dated: July 15, 2018

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


K&L GATES LLP

Dated: July 15, 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: 7/16/2018

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