

1 Frank M. Radoslovich, SBN 161457
 2 Email: frank@radshap.com
 3 Omid Shabani, SBN 267447
 4 Email: omid@radshap.com
 5 **RADOSLOVICH | SHAPIRO, PC**
 6 701 University Avenue, Suite 100
 7 Sacramento, CA 95825
 8 Telephone: (916) 565-8161
 9 Facsimile: (916) 565-8170

10 Joshua D. Cohen (Bar no. 184067)
 11 Email: jcohen@wendel.com
 12 Katherine Kao (Bar No. 267475)
 13 Email: kkao@wendel.com
 14 **WENDEL, ROSEN, BLACK & DEAN LLP**
 15 1111 Broadway, 24th Floor
 16 Oakland, California 94607-4036
 17 Tel: (510) 834-6600
 18 Fax: (510) 834-1928

19 Attorneys for Plaintiff
 20 Vietnam Reform Party
 21 (a/k/a/ Việt Nam Canh Tân
 22 Cách Mạng Đảng or Viet Tan),
 23 an unincorporated association

24 Attorneys for Defendant Nguyen Thanh Tu

25 UNITED STATES DISTRICT COURT
 26 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 27 OAKLAND DIVISION

28 VIETNAM REFORM PARTY (a/k/a/ Việt)
 29 Nam Canh Tân Cách Mạng Đảng or Viet Tan),)
 30 an unincorporated association,)

31 Case No. 4:17-CV-00291-HSG

32 Plaintiff,

33 **JOINT STIPULATION AND ORDER**
 34 **FOR DISMISSAL WITH PREJUDICE AS**
 35 **TO DEFENDANT NGUYEN THANH TU**
 36 **ONLY.**

37 v.)

38 VIET TAN - VIETNAM REFORM PARTY, a)
 39 California nonprofit corporation; NGUYỄN)
 40 THANH TU, an individual; MICHELLE)
 41 DUONG, an individual; and DOES 1 through)
 42 50 inclusive,)

43 Hon. Haywood S. Gilliam, Jr.
 44 Courtroom No.: 2—4th Floor

45 Defendants.)

46 TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL:

47 Plaintiff, Vietnam Reform Party (hereinafter “Viet Tan”) and defendant Nguyen Thanh
 48 Tu (hereinafter “Nguyen Tu”), acting through counsel, and pursuant to Federal Rule of Civil
 49 Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement entered into
 50 by them, to the Dismissal With Prejudice of this action against defendant Nguyen Tu, only.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: December 26, 2018

RADOSLOVICH | SHAPIRO, PC

/s/ Omid Shabani
FRANK M. RADOSLOVICH
OMID SHABANI
Attorneys for Plaintiff

DATED: December 26, 2018

Wendel, Rosen, Black & Dean LLP

/s/ Joshua D. Cohen
Joshua D. Cohen
Attorneys for defendant Nguyen Thanh Tu

ORDER

1
2 The stipulation is approved. The action is hereby dismissed with prejudice, as to
3 defendant Nguyen Thanh Tu only.
4

5 DATED: 12/27/2018


6 JUDGE HAYWOOD S. GILLIAM, JR.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28