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 U.S. BANK NATIONAL ASSOCIATION

12 *Additional Counsel – Next Page*

13
 14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 KALIEN FRAZIER, on behalf of himself and
 17 others similarly situated,
 18 Plaintiff,
 19 vs.
 20 U.S. BANK NATIONAL ASSOCIATION, and
 DOES 1 to 100, inclusive,
 21 Defendant.
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Case No. 4:23-cv-05675
JOINT STIPULATION OF DISMISSAL AND
[PROPOSED] ORDER OF DISMISSAL
WITHOUT PREJUDICE

Judge: Hon. Jon S. Tigar

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Attorneys for Plaintiff
KALIEN FRAZIER

1 **STIPULATION TO DIMISS**

2 Plaintiff KALIEN FRAZIER (“Plaintiff”) and Defendant U.S. BANK NATIONAL
3 ASSOCIATION (“Defendant”) (collectively, the “Parties”), by and through their respective,
4 undersigned counsel, hereby jointly stipulate and agree that Kalien Frazier hereby dismisses without
5 prejudice the entire action and all claims being asserted against Defendant in the above-captioned action
6 pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Each side shall bear its own
7 costs and attorneys’ fees.

8 WHEREFORE, the Parties hereby request that the Court dismiss this case without prejudice, with
9 each Party to bear his or its own costs and attorneys’ fees.

10 **IT IS SO STIPULATED.**

11
12 Dated: June 4, 2024

LAVI & EBRAHIMIAN, LLP

13 By: /s/ Cassandra Castro
14 Joseph Lavi
15 Vincent C. Granberry
16 Cassandra Castro
Attorneys for Plaintiff
KALIEN FRAZIER

17
18 Dated: June 4, 2024

WINSTON & STRAWN LLP

19 By: /s/ Emilie C. Woodhead
20 Joan B. Tucker Fife
21 Emilie C. Woodhead
22 Winston K. Hu
Attorneys for Defendant
U.S. BANK NATIONAL ASSOCIATION


1 **[PROPOSED] ORDER OF DISMISSAL**

2 Pursuant to the Stipulation of all Parties who have appeared in the action and good cause
3 appearing, the Court ORDERS the following:

4 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, this action and all
5 claims asserted in the above-captioned action by Plaintiff against the Defendant are DISMISSED
6 WITHOUT PREJUDICE. Each party shall bear its own costs and attorneys' fees. The Clerk of the Court
7 is directed to close the case.

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9 **IT IS SO ORDERED.**

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11 Dated: June 5, 2024

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14 _____
15 Honorable Jon S. Tigar
16 United States District Court Judge
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