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9 Attorneys for Defendant
International Business Machines Corporation
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 (SAN JOSE DIVISION)

14 MARY HELEN WOODSON,

15 Plaintiff,

16 vs.

17 INTERNATIONAL BUSINESS MACHINES
CORPORATION and DOES ONE through
18 TWENTY, Inclusive,

19 Defendant.
20

CASE NO. C 05-03387 JF (PVT)

**[PROPOSED] ORDER AND
STIPULATION REGARDING
DISMISSAL OF ENTIRE
CONSOLIDATED ACTION WITH
PREJUDICE**

21 IT IS HEREBY STIPULATED by and between plaintiff Mary Helen Woodson
22 (“Woodson”) and defendant International Business Machines Corporation (“IBM”), through their
23 designated counsel, as follows:

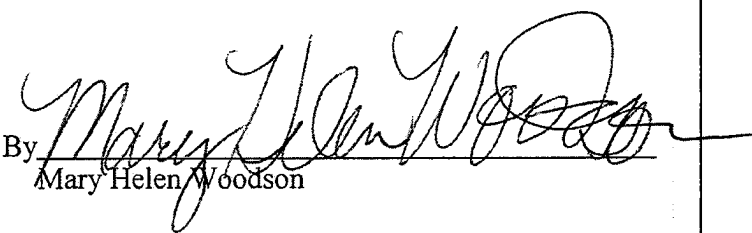
24 1. Woodson and IBM have agreed to settle all claims alleged in Woodson’s action
25 assigned case number C05-03387 JF (PVT), and in Woodson’s action assigned case number C05-
26 03939 JF (PVT), which were consolidated under case number C05-03387 JF (PVT) (“the
27 consolidated action”).
28

1 2. Accordingly, pursuant to Federal Rule of Civil Procedure 41(a) and (c), Woodson
2 and IBM hereby request that the Court order the consolidated action, and each and every claim
3 asserted in each of the civil actions that together comprise the consolidated action, dismissed with
4 prejudice.

5 3. Each party shall bear its own costs and attorneys' fees in connection with all claims
6 in the consolidated action.

7
8 DATED: September 2, 2008



By 
Mary Helen Woodson

12 DATED: September 2, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

14
15 By 

Scott G. Lawson
Attorneys for Defendant
International Business Machines Corporation

18
19 **ORDER**

20 Pursuant to the foregoing stipulation of the parties, IT IS SO ORDERED.

21
22 DATED: 9/8/08

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24 
25 Hon. Jeremy Fogel
United States District Judge

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CERTIFICATE OF SERVICE

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065-2139.

On **September 5, 2008**, I served true copies of the following document(s) described as

[PROPOSED] ORDER AND STIPULATION REGARDING DISMISSAL OF ENTIRE CONSOLIDATED ACTION WITH PREJUDICE

on the parties in this action as follows:

BY MAIL: I enclosed the foregoing into sealed envelope(s) addressed as shown above, and I deposited such envelope(s) in the mail at Redwood Shores, California. The envelope was mailed with postage thereon fully prepaid.

BY ELECTRONIC MAIL TRANSMISSION: By electronic mail transmission from andreaproberts@quinnemanuel.com on **September 5, 2008**, by transmitting a PDF format copy of such document(s) to each such person at the e-mail address listed below their address(es). The document(s) was/were transmitted by electronic transmission and such transmission was reported as complete and without error.

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **September 5, 2008**, at Redwood Shores, California.


Andrea Pallios Roberts