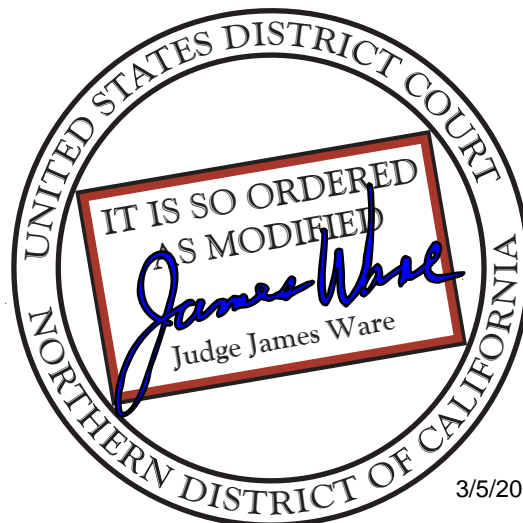


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 15 *EHART, KRISTY EHART, and STEVEN*  
 16 *RYAN McCLANAHAN*



3/5/2010

17 IN THE UNITED STATES DISTRICT COURT  
 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 19 SAN JOSE DIVISION

20 JEREMY JAMES EHART, KRISTY EHART,  
 21 and STEVEN RYAN McCLANAHAN,

22 Plaintiffs,

23 vs.

24 GHILLIE SUITS.COM INC.; TODD  
 25 MUIRHEAD; NEW YORK FIRE-SHIELD  
 26 INCORPORATED; WACKENHUT  
 27 SERVICES, INCORPORATED; THE  
 28 WACKENHUT CORPORATION; and DOES 1  
 – 50, inclusive,

Defendants.

AND RELATED CROSS ACTION(S)

No. 5:06-CV-6507-JW

STIPULATION AND ~~PROPOSED~~  
 ORDER FOR DISMISSAL WITH  
 PREJUDICE

COME NOW Plaintiffs, JEREMY JAMES EHART, KRISTY EHART, and STEVEN RYAN  
 McCLANAHAN, and Defendants, GHILLIE SUITS.COM INC.; TODD MUIRHEAD; NEW YORK  
 FIRE-SHIELD INCORPORATED; WACKENHUT SERVICES, INCORPORATED; THE

1 WACKENHUT CORPORATION, and file this their Stipulation and [Proposed] Order for Dismissal  
2 with Prejudice and in that regard would show:

3 I.

4 Plaintiffs and Defendants have amicably resolved all issues involved in this lawsuit and have  
5 reached a compromise settlement agreement. A Settlement Agreement and Release has been fully  
6 executed for each Plaintiff and all Defendants have fully funded all payment amounts as required by the  
7 terms of the settlement agreements.  
8

9 II.

10 Plaintiffs have not resolved the United States government's liens; however, that does not affect  
11 the settlement referenced above. The entire lien amounts requested by the Department of the Navy  
12 pursuant to the Medical Care Recovery Act (\$133,455.66 for Ryan McClanahan and \$418,331.18 for  
13 Jeremy Ehart) have been deposited into an interest bearing account on their behalf, pending negotiation  
14 of the reduction and/or waiver and/or request by the Department of the Navy for the entire final amounts  
15 claimed. No action will be taken at this time to disburse any of these monies until Plaintiffs have gone  
16 through the administrative process and either an agreement is reached or subsequently the matter is  
17 resolved by declaratory proceeding where all parties are given advance notice. Plaintiffs reserve any  
18 and all defenses or limitations to the United States government's liens including, but not limited to, the  
19 United States government's negligence, the made whole doctrine, and hardship considerations.

20 III.

21 IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of  
22 record that, pursuant to the Federal Rules of Civil Procedure Rule 41(a)(1)(A)(ii), all causes of action  
23 asserted on behalf of plaintiffs JEREMY JAMES EHART, KRISTY EHART, and STEVEN RYAN  
24 McCLANAHAN as set forth in the complaint on file herein, as well as all related cross actions between  
25 and amongst Defendants, GHILLIE SUITS.COM INC.; TODD MUIRHEAD; NEW YORK FIRE-  
26 SHIELD INCORPORATED; WACKENHUT SERVICES, INCORPORATED; THE WACKENHUT  
27 CORPORATION, shall be and are hereby dismissed with prejudice, and that each party shall bear its  
28

1 own costs and attorney's fees herein.

2 DATED: 2.26.10

NEEDHAM, KEPNER FISH & JONES LLP

By: 

Craig Needham  
Attorneys for Plaintiffs

6 DATED: 2/26/10

TINSMAN & SCIANO, INC.

By: 

Daniel I. T. Sciano  
Attorneys for Plaintiffs

11 DATED:

SELMAN BREITMAN LLP

By:

Paul E. Stephan  
Attorneys for GHILLIE SUITS.COM, INC.  
and TODD MUIRHEAD

16 DATED: 3/1/10

MANNING & MARDER, KASS, ELLROD,  
RAMIREZ LLP

By: 

Michael L. Smith  
Attorneys for WACKENHUT SERVICES,  
INCORPORATED and THE WACKENHUT  
CORPORATION

22 DATED: 3/1/10

ROPER, MAJESKI, KOHN & YOUNG, LLP

By: 

Dennis J. Ward  
Attorneys for NEW YORK FIRE-SHIELD,  
INC.

own costs and attorney's fees herein.

DATED: 2-26-10

NEEDHAM, KEPNER FISH & JONES LLP

By:

Craig Needham  
Attorneys for Plaintiffs

DATED: 2/26/10

TINSMAN & SCLANO, INC.

By:

Daniel I. T. Sclano  
Attorneys for Plaintiffs

DATED: 3/11/2010

SELMAN BREITMAN LLP

By:

Paul E. Stephan  
Attorneys for GHILLIE SUITS.COM, INC.  
and TODD MUIRHEAD

DATED: 3/1/10

MANNING & MARDER, KASS, ELLROD,  
RAMIREZ LLP

By:

Michael L. Smith  
Attorneys for WACKENHUT SERVICES,  
INCORPORATED and THE WACKENHUT  
CORPORATION

DATED:

ROPER, MAJESKI, KOHN & YOUNG, LLP

By:

Dennis J. Ward  
Attorneys for NEW YORK FIRE-SHIELD,  
INC.

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