

1 **Thomas P. Riley, SBN 194706**
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3 **First Library Square**
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5 **South Pasadena, CA 91030-3227**

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7 **Fax: 626-799-9795**
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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Jose Eduardo Orozco, et al.**

17 **Defendants.**

18 **CASE NO. CV 08-1871 JF**


19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT**
21 **AGAINST DEFENDANTS JOSE**
22 **EDUARDO OROZCO, SANDRA**
23 **OROZCO, individually and d/b/a**
24 **PUERTO AZUL RESTAURANT and**
25 **GOOSETOWN, INC., an unknown**
26 **business entity d/b/a PUERTO AZUL**
27 **RESTAURANT**

28 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS, INC. and Defendants JOSE EDUARDO OROZCO, SANDRA OROZCO, individually and d/b/a Puerto Azul Restaurant and GOOSETOWN, INC., an unknown business entity d/b/a PUERTO AZUL RESTAURANT that the above-entitled action is hereby dismissed **without prejudice** against JOSE EDUARDO OROZCO, SANDRA OROZCO, individually and d/b/a Puerto Azul Restaurant and GOOSETOWN, INC., an unknown business entity d/b/a PUERTO AZUL RESTAURANT to the Court's jurisdiction to enforce the settlement agreement reached between the Parties.

1 **IT IS FURTHER STIPULATED** that provided no Party referenced above has
2 filed a motion to reopen this action by February 12, 2009, this Court shall *not* have
3 jurisdiction to set aside the dismissal and the dismissal shall be deemed to be **with**
4 **prejudice**.

5 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1).
6 Each Party referenced-above shall bear its own attorneys' fees and costs.
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10 Dated: December 9, 2008



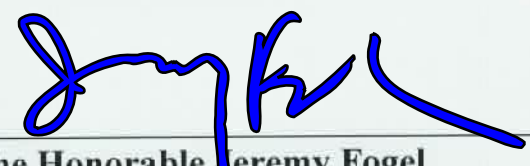
LAW OFFICES OF THOMAS P. RILEY, P.C.
By: Thomas P. Riley
Attorneys for Plaintiff
J & J SPORTS PRODUCTIONS, INC.

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16 Dated:

Please see attached

LAW OFFICES OF KEVIN P. COURTNEY
By: Kevin P. Courtney
Attorneys for Defendants

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22 **IT IS SO ORDERED:**

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24 

25 **The Honorable Jeremy Fogel**
26 **United States District Court**
27 **Northern District of California**
28

Dated: 1/14/09

1
2
3 Dated: December 9, 2008

s/ Thomas P. Riley

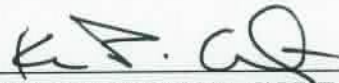
LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

J & J SPORTS PRODUCTIONS, INC.

4
5
6
7
8 Dated: 12/11/08



LAW OFFICES OF KEVIN P. COURTNEY

By: Kevin P. Courtney

Attorneys for Defendants

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14 **IT IS SO ORDERED:**

15
16 Dated: _____

17
18 **The Honorable Jeremy Fogel
United States District Court
Northern District of California**

19
20 **PROOF OF SERVICE (SERVICE BY MAIL)**

21 I declare that:

22 I am employed in the County of Los Angeles, California. I am over the age of eighteen years
23 and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue,
24 South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and
25 processing of correspondence/documents for mail in the ordinary course of business.

26
27 On December 9, 2008, I served:

28 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST
DEFENDANTS JOSE EDUARDO OROZCO, SANDRA OROZCO, individually and**

1 **PROOF OF SERVICE (SERVICE BY MAIL)**

2

3 I declare that:

4 I am employed in the County of Los Angeles, California. I am over the age of
5 eighteen years and not a party to the within cause; my business address is First Library
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7 familiar with this law firm's practice for collection and processing of
8 correspondence/documents for mail in the ordinary course of business.

9

10 On December 9, 2008, I served:

11 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT**
12 **AGAINST DEFENDANTS JOSE EDUARDO OROZCO, SANDRA**
13 **OROZCO, individually and d/b/a PUERTO AZUL RESTAURANT and**
14 **GOOSETOWN, INC., an unknown business entity d/b/a PUERTO AZUL**
15 **RESTAURANT**

16 On all parties in said cause by enclosing a true copy thereof in a sealed envelope
17 with postage prepaid and following ordinary business practices, said envelope was duly
18 mailed and addressed to:

19

20 Mr. Kevin P. Courtney, Esquire
21 LAW OFFICES OF KEVIN P. COURTNEY
22 17415 Monterey Rd., Suite 204
23 Morgan Hills, CA 95037

Attorneys for Defendants

24 I declare under the penalty of perjury pursuant to the laws of the United States
25 that the foregoing is true and correct and that this declaration was executed on
26 December 9, 2008, at South Pasadena, California.

27 Dated: December 9, 2008

28 

INESA MAMIDJANYAN