

1 Aaron A. Roblan, State Bar No. 244308
 aaron.roblan@ogletreedeakins.com
 2 Erica K. Rocush, State Bar No. 262354
 erica.rocush@ogletreedeakins.com,
 3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 Steuart Tower, Suite 1300
 4 One Market Plaza
 San Francisco, CA 94105
 5 Telephone: 415.442.4810
 Facsimile: 415.442.4870
 6

Attorneys for Defendant Arrow Electronics, Inc.

7
 8 Mark C. Peters, State Bar No. 160611
 mark@dplolaw.com
 DUCKWORTH PETERS LEBOWITZ OLIVIER LLP
 9 100 Battery Street, Suite 1800
 San Francisco, CA 94104
 10 Telephone: (415) 433-0333
 Facsimile: (415) 449-6556
 11

Attorneys for Plaintiff Laraine Pitcher

12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 14

15 LARAIN PITCHER
 16 Plaintiff,
 17 v.
 18 ARROW ELECTRONICS, INC., a New York
 19 corporation,
 20 Defendant.

Case No. C 10-01759 LHK
**STIPULATION AND ~~PROPOSED~~
 ORDER FOR DISMISSAL OF
 COMPLAINT WITH PREJUDICE
 PURSUANT TO FRCP 41**

21 WHEREAS, Plaintiff Laraine Pitcher (“Plaintiff” or “Pitcher”) and Defendant Arrow
 22 Electronics, Inc. (“Defendant” or “Arrow”) (collectively, “the Parties”) have agreed to fully
 23 settle the instant action;

24 WHEREAS, the Parties have entered into a settlement and executed a Confidential
 25 Settlement Agreement resolving all of Plaintiff’s claims against Defendant, including all claims
 26 arising under the Federal Age Discrimination in Employment Act (“ADEA,” 29 U.S.C. § 621, *et*.
 27 *seq.*) in exchange for valuable consideration;
 28

1 NOW THEREFORE, the Parties hereby jointly and respectfully request that the Court,
2 pursuant to Federal Rule of Civil Procedure 41(a)(1), discontinue and dismiss with prejudice the
3 above-titled action as to all parties, with each party bearing her or its own fees and costs.
4

5 DATED: May 9, 2011

OGLETREE, DEAKINS, NASH, SMOAK &
6 STEWART, P.C.

7
8 By: /s/ Erica K. Rocush

9 Aaron A. Roblan
10 Erica K. Rocush
Attorneys for Defendant Arrow
11 Electronics, Inc.

12 DATED: May 9, 2011

DUCKWORTH PETERS LEBOWITZ
13 OLIVIER LLP

14 By: /s/ Mark C. Peters

15 Mark C. Peters
Attorneys for Plaintiff Laraine Pitcher
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[PROPOSED] ORDER

Having been advised by the Parties that a Settlement Agreement was entered into, pursuant to which Plaintiff Laraine Pitcher has agreed to release all claims, including all claims arising under the Federal Age Discrimination in Employment Act (“ADEA,” 29 U.S.C. § 621, *et seq.*) against defendant Arrow Electronics, Inc. in exchange for valuable consideration, the matter of *Laraine Pitcher v. Arrow Electronics, Inc., et al.*, United States District Court, Northern District of California, Case No. C 10-01754 LHK, is, by reason of the settlement, hereby dismissed with prejudice in its entirety as to all parties, each party to bear her or its own costs and fees. The Clerk shall close the file.

IT IS SO ORDERED.

Dated: May 9, 2011



Hon. Lucy Koh
United States District Court