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 13 Attorneys for Plaintiff
 KATHY NAVARRO

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 15 **IN THE UNITED STATES DISTRICT COURT**
 16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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18 KATHY NAVARRO, an individual,
 19 Plaintiff,

20 v.

21 ARROW ELECTRONICS, INC., a New York
 corporation; and DOES 1-50, inclusive,
 22 Defendants.
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Case No. CV 10 3210 EJD

**STIPULATION AND [PROPOSED]
 ORDER FOR DISMISSAL OF
 COMPLAINT WITH PREJUDICE
 PURSUANT TO FRCP 41**

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 26 WHEREAS, Plaintiff Kathy Navarro (“Plaintiff” or “Navarro”) and Defendant Arrow
 27 Electronics, Inc. (“Defendant” or “Arrow”) (collectively, “the Parties”) have agreed to fully settle

28 Case No. CV 10 3210 EJD

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

1 the instant action;

2 WHEREAS, the Parties have entered into a settlement and executed a Confidential
3 Settlement Agreement resolving all of Plaintiff's claims against Defendant, including all claims
4 arising under the Federal Age Discrimination in Employment Act ("ADEA," 29 U.S.C. § 621, et.
5 seq.) in exchange for valuable consideration;

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

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10 DATED: September __, 2012

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

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By: /s/ Erica K. Rocush
Thomas M. McInerney
Erica K. Rocush
Attorneys for Defendant Arrow
Electronics, Inc.

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16 DATED: September __, 2012

HINKLE, JACHIMOWICZ, POINTER &
EMANUEL

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By: /s/ Gerald Emanuel
Gerald Emanuel
Attorneys for Plaintiff Kathy Navarro

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~~PROPOSED~~ ORDER

Having been advised by the Parties that a Settlement Agreement was entered into, pursuant to which Plaintiff Kathy Navarro 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 Kathy Navarro v. Arrow Electronics, Inc., et al., United States District Court, Northern District of California, Case No. C 10-3210 EJD, 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.

IT IS SO ORDERED. The Clerk shall close this file.

Dated: September 14, 2012



Hon. Edward J. Davila
United States District Court