

1 Lara R. Shapiro (State Bar No. 227194)
2 Johanna Kwasniewski (SBN 268474) 4145 Via Marina # 324
3 Marina del Rey, CA 90292
4 Telephone: (310) 577-0870
5 Facsimile: (424) 228-5351
6 Of Counsel to
7 Lemberg & Associates LLC, A Connecticut Law Firm
8 1100 Summer Street Stamford, CT 06905
9 Telephone: (203) 653-2250
10 Facsimile: (203) 653-3424

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Attorneys for Plaintiff, Sergey Shcherbakov

11 Carl A. Sundholm (State Bar No. 131940)
12 Law Offices of Carl A. Sundholm
13 750 Menlo Avenue, Suite 100
14 Menlo Park, CA 94025
15 Telephone: (650) 473-9050
16 Facsimile: (650) 473-6897

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 Sergey Shcherbakov,

Case: 5:10-CV-03728-HRL

14 Plaintiff,

STIPULATION FOR DISMISSAL
WITH PREJUDICE AND ~~(PROPOSED)~~
ORDER OF DISMISSAL

vs.

15 Phoenix Group, LLC., and Does 1-100, inclusive,

16 Defendants.

[Re: Docket No. 30]

17 _____ /
18 All parties hereto having agreed to settle the above-captioned action, Plaintiff Sergey
19 Shcherbakov and Defendant Finex Group, LLC, erroneously sued herein as Phoenix Group,
20 LLC, by and through their undersigned counsel of record, hereby stipulate and agree that the
21 above-captioned case be dismissed with prejudice, pursuant to Federal Rule of Civil Procedure
22 41(a)(1). The parties have agreed to settle this case by a “walkaway” settlement with each party
23 to bear their own costs and attorney fees, and agree to a mutual release of all claims they may
24 have as against one another. This agreement was negotiated in good faith and constitutes a
25

1 settlement of claims that were vigorously contested, denied, and disputed by the parties. The
2 undersigned representatives of each party certify they are fully authorized by the party they
3 represent to agree to the terms and conditions set forth above, which shall become effective
4 upon entry and approval of this Stipulation by the Court.

5 IT IS SO STIPULATED

6 Dated: March 29, 2011

7 For Plaintiff Sergey Shcherbakov:
By Lara R. Shapiro, Esq.

8 /s/

9 By: _____
Lara R. Shapiro
Johanna Kwasniewski
10 Attorney for Plaintiff, Sergey Shcherbakov

11 Dated: March 29, 2011

12 For Defendant Finex Group LLC
By Carl A. Sundholm

13 /s/

14 By: _____
Carl A. Sundholm, Esq.
Law Offices of Carl A. Sundholm
15 Attorney for Defendant Finex Group LLC

16 IT IS SO ORDERED:

17 Dated: March 30, 2011

18 

HOWARD R. LLOYD
United States District Court Magistrate Judge