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5 Attorney for Defendant  
 STANDARD INSURANCE COMPANY

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 7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 LORELEI CRESCINI,  
 11  
 12 Plaintiff,

13 v.

14  
 15 STANDARD INSURANCE  
 16 COMPANY, et al.,  
 17  
 18 Defendants.

) Case No.: CV 11-02328 EJD  
 )  
 ) STIPULATION AND PROPOSED  
 ) ORDER FOR DISMISSAL WITH  
 ) PREJUDICE OF ENTIRE ACTION  
 )  
 ) No hearing set or required.

19 Counsel for the parties, Plaintiff Lorelei Crescini and Defendant Standard  
 20 Insurance Company (“Standard”), jointly and respectfully submit this Stipulation  
 21 and Order for Dismissal with Prejudice of this entire action, following settlement  
 22 of this matter on terms that are confidential.

23 More specifically, each and all of the parties hereto, by and through their  
 24 respective undersigned counsel, stipulate to the dismissal of this entire action with  
 25 prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), each party to  
 26 bear her or its own costs, expenses and attorney fees. The parties further stipulate  
 27 that this Court shall retain continuing jurisdiction over any dispute arising out of  
 28

1 the settlement of this matter. *The parties add that there is no dispute currently and*  
2 *none is anticipated.*

3 Local Civil Rule 7-12, Stipulations, provides:

4 Every stipulation requesting judicial action must be in writing signed by all  
5 affected parties or their counsel. A proposed form of order may be submitted  
6 with the stipulation and may consist of an endorsement on the stipulation of  
7 the words, "PURSUANT TO STIPULATION, IT IS SO ORDERED," with  
8 spaces designated for the date and the signature of the Judge.

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1 Pursuant to their settlement and the terms of Local Rule 7-12, the parties  
2 respectfully request that the Court enter the Order that follows.

3 So Stipulated:

4 Dated: September 29, 2011

5 s/Constantin V. Roboostoff  
6 CONSTANTIN V. ROBOOSTOFF 69328  
7 ROBOOSTOFF & KALKIN  
8 A PROFESSIONAL LAW  
9 CORPORATION  
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15 Attorneys for Plaintiff  
16 LORELEI CRESCINI

17 Dated: September 29, 2011

18 s/Warren H. Nelson, Jr.  
19 WARREN H. NELSON, JR. 104744  
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26 Attorney for Defendant  
27 STANDARD INSURANCE COMPANY

28 SIGNATURE ATTESTATION

Pursuant to General Order No. 45 § XB, I, Warren H. Nelson, Jr., the e filer  
of this document, attest that concurrence in the filing of this document has been  
obtained from the other signatory shown above, Constantin V. Roboostoff, Esq,  
who is a registered “e filer” with this Court.

Dated: September 29, 2011

s/Warren H. Nelson, Jr.  
WARREN H. NELSON, JR. # 104744

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall close this file.

Dated: October 6, 2011

  
EDWARD J. DAVILA, JUDGE  
UNITED STATES DISTRICT COURT