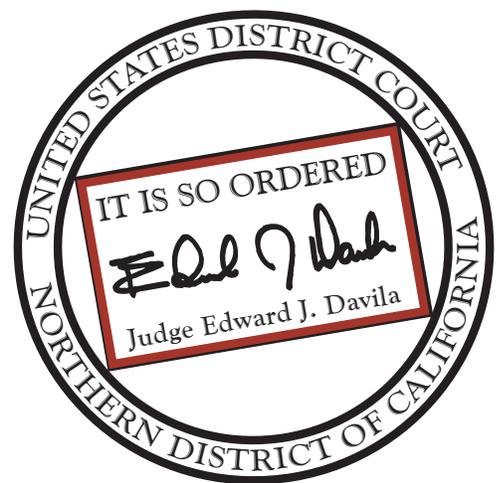


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8 Attorney for Plaintiff
 9 ALBERT LARA RODRIGUEZ

1/26/2012

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 ALBERT LARA RODRIGUEZ
 13 Plaintiff,
 14 vs.
 15 COUNTY OF SANTA CLARA; SANTA
 16 CLARA COUNTY DEPARTMENT OF
 17 CORRECTION; EDWARD C. FLORES,
 18 individually and in his capacity as former
 19 Director of the Santa Clara County Department
 20 of Corrections; and DOES 1 through 100,
 21 inclusive
 22 Defendants.

Case No. 5:11-CV-02622-EJD

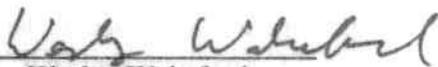
**STIPULATION PERMITTING
 PLAINTIFF ALBERT LARA
 RODRIGUEZ TO DISMISS WITH
 PREJUDICE ALL CLAIMS AGAINST
 ALL DEFENDANTS**

23 Pursuant to Federal Rule of Civ. Proc. 41(a)(1) and Local Rule 77-2(c), Plaintiff Albert
 24 Lara Rodriguez and Defendants County of Santa Clara; Santa Clara County Department of
 25 Correction; and Edward C. Flores, each stipulate to permit Plaintiff Albert Lara Rodriguez to
 26 dismiss with prejudice all claims asserted in this action against each and every Defendant. It is
 27 further stipulated that Defendants County of Santa Clara; Santa Clara County Department of
 28 Correction; and Edward C. Flores each waive all rights to any claim they may have against
 Plaintiff Albert Lara Rodriguez for the recovery of attorneys fees or costs.

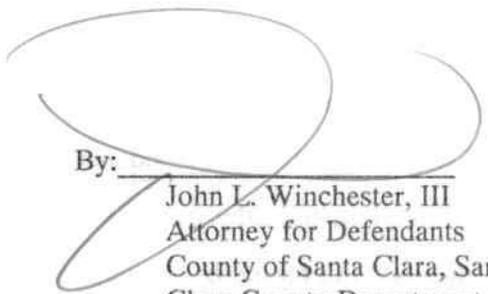
1 The undersigned attorneys of record for the various parties to this action each certify that
2 they are fully authorized by the party or parties represented to agree to and enter into this
3 stipulation permitting Plaintiff Albert Lara Rodriguez to dismiss with prejudice all claims
4 asserted against Defendants County of Santa Clara; Santa Clara County Department of
5 Correction; and Edward C. Flores. The terms of this Stipulation shall become effective upon the
6 Court's approval and entry of this Stipulation.

7 Accordingly, the parties each respectfully request that the Court approve and enter
8 Plaintiff Albert Lara Rodriguez's dismissal with prejudice of all claims asserted against
9 Defendants County of Santa Clara; Santa Clara County Department of Correction; and Edward C.
10 Flores. Additionally, the parties further stipulate and request that the Court retain jurisdiction to
11 oversee compliance with this Stipulation and to resolve any issues, disputes, or questions
12 regarding Plaintiff's dismissal of Defendants. (See *Kokkonen v. Guardian Life Ins. Co. of*
13 *America*, 511 U.S. 375 (1994).

14
15
16 Dated: 1/24/2012

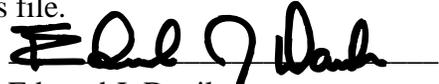
17 By: 
18 Wesley Wakeford
19 Attorney for Plaintiff
Albert Lara Rodriguez

20 Dated: 1/24/12

21
22
23 By: 
24 John L. Winchester, III
25 Attorney for Defendants
County of Santa Clara, Santa
26 Clara County Department of
Correction; and Edward C. Flores

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

28 Dated: January 26, 2012


Edward J. Davila
United States District Judge