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6 **Attorneys for Plaintiff**
J & J Sports Productions, Inc.

8 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

10 **J & J SPORTS PRODUCTIONS, INC.,**

11 **Plaintiff,**

12 **vs.**

13 **CONG NGOC TRAN,**

14 **Defendant.**

CASE NO. 5:12-cv-02251-LHK

**STIPULATION OF DISMISSAL OF
PLAINTIFF'S COMPLAINT AGAINST
DEFENDANT CONG NGOC TRAN,
individually and d/b/a QUYNH LAN**

17 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS,
18 INC. and Defendant CONG NGOC TRAN, individually and d/b/a QUYNH LAN, that the above-
19 entitled action is hereby dismissed **without prejudice** against CONG NGOC TRAN, individually and
20 d/b/a QUYNH LAN and subject to the Court's jurisdiction to enforce the settlement agreement
21 reached between the Parties.

22 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
23 motion to reopen this action by October 3, 2014, the dismissal shall be deemed to be **with**
24 **prejudice.**

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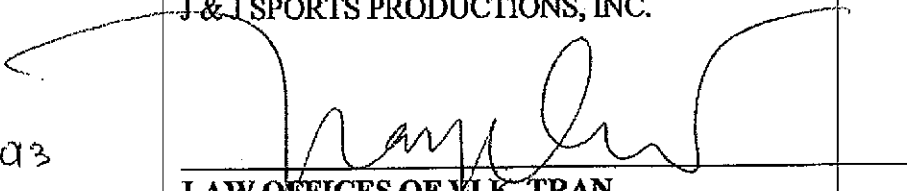
This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party referenced-above shall bear its own attorneys' fees and costs.

Dated: April 30, 2013



LAW OFFICES OF THOMAS P. RILEY, P.C.
By: Thomas P. Riley
Attorneys for Plaintiff
J & J SPORTS PRODUCTIONS, INC.

Dated: April 30, 2013



LAW OFFICES OF VI K. TRAN
By: Vi K. Tran
Attorneys for Defendant
CONG NGOC TRAN, individually and d/b/a QUYNH LAN

IT IS SO ORDERED: The Clerk shall close the file.



Dated: May 1, 2015

The Honorable Lucy H. Koh
United States District Court
Northern District of California

1 **PROOF OF SERVICE (SERVICE BY MAIL)**

2 I declare that:

3
4 I am employed in the County of Los Angeles, California. I am over the age of eighteen
5 years and not a party to the within cause; my business address is First Library Square, 1114 Fremont
6 Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for
7 collection and processing of correspondence/documents for mail in the ordinary course of business.

8
9 On May 1, 2013, I caused to serve the following documents entitled:

10
11 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST**
12 **DEFENDANT CONG NGOC TRAN, individually and d/b/a QUYNH LAN**

13
14 On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage
15 prepaid and following ordinary business practices, said envelope was addressed to:

16 Mr. Vi Tran, Esquire
17 LAW OFFICES OF VI. K. TRAN
18 1625 The Alameda, Suite 800
19 San Jose, CA 95126

(Attorney for Defendant)

20 The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's
21 outbound mail receptacle in order that this particular piece of mail could be taken to the United States
22 Post Office in South Pasadena, California later this day by myself (or by another administrative
23 assistant duly employed by our law firm).

24 I declare under the penalty of perjury pursuant to the laws of the United States that the
25 foregoing is true and correct and that this declaration was executed on May 1, 2013, at South
26 Pasadena, California.

27 Dated: April 30, 2013

28 
VANESSA VENTURA