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11 Attorneys for PAJARO VALLEY UNIFIED SCHOOL DISTRICT

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
 14

15	LR, by and through her guardian ad litem,	)	Case No. 15-cv-00368-NC
16	SCOTT RANDOLPH, SCOTT RANDOLPH,	)	
17	and SUZANNE RANDOLPH, her parents,	)	<b>JOINT STIPULATION AND REQUEST</b>
18		)	<b>FOR DISMISSAL OF ENTIRE</b>
19		)	<b>COMPLAINT AND COUNTER-CLAIM</b>
20		)	<b>AND <del>PROPOSED</del> ORDER</b>
21		)	
22		)	
23		)	
24		)	
25		)	
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27		)	
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PAJARO VALLEY UNIFIED SCHOOL ) The Honorable Nathaniel Cousins  
 DISTRICT, ) Crtrm. 7, 4<sup>th</sup> Floor  
 Defendant and Counterclaimant. ) No Trial Date Set

Plaintiffs LR, by and through her guardian ad litem, SCOTT RANDOLPH, SCOTT  
 RANDOLPH, and SUZANNE RANDOLPH and Defendant PAJARO VALLEY UNIFIED  
 SCHOOL DISTRICT (together "Parties") hereby stipulate and request as follows:

1 WHEREAS Plaintiffs filed the complaint in this matter alleging a single cause of action for  
2 review of an adverse state administrative decision under the Individuals with Disabilities  
3 Education Act (“IDEA”), 20 U.S.C. § 1400 *et seq.* on January 27, 2015 (Docket No. 1);

4 WHEREAS Defendant filed its answer and counterclaim for review under the IDEA on  
5 March 10, 2015 (Docket Nos. 8, 9);

6 WHEREAS the parties have been engaged in settlement discussions during the pendency  
7 of this action;

8 WHEREAS the Parties entered into a settlement agreement disposing of all claims on  
9 August 6, 2015; and

10 WHEREAS the settlement agreement requires the Parties to dismiss all pending legal  
11 claims pending against the other with prejudice;

12 The Parties hereby STIPULATE AND REQUEST that the Court dismiss this entire action,  
13 including the complaint and counterclaim, WITH PREJUDICE.

14

15 Date: August 7, 2015

\_\_\_\_\_/JR/\_\_\_\_\_  
Jeffrey Randolph, Attorney for Plaintiff LR, SCOTT  
16 RANDOLPH, AND SUZANNE RANDOLPH

17 Date: August 7, 2015

\_\_\_\_\_/DRM/\_\_\_\_\_  
David R. Mishook, Attorney for Defendant, PAJARO  
18 VALLEY UNIFIED SCHOOL DISTRICT

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20 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT this case, including all  
21 claims and counter-claims, be dismissed WITH PREJUDICE.

22 **IT IS SO ORDERED.**

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24 DATED: August 7, 2015

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27 00223-00164/804312.1

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The Honorable

