

1 BRIAN J. STRETCH (CABN 163973)  
 Acting United States Attorney  
 2  
 3 THOMAS MOORE (ALBN 4305-078T)  
 Chief, Tax Division  
 4 MICHAEL G. PITMAN (DCBN 484164)  
 Assistant United States Attorney  
 5 150 Almaden Boulevard, Suite 900  
 San Jose, CA 95113  
 6 Telephone: (408) 535-5040  
 Facsimile: (408) 535-5081  
 7 michael.g.pitman@usdoj.gov  
 8 Attorneys for the United States of America

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN JOSE DIVISION

<p>12 Bertram Chan &amp; Marie Chan,          13 Plaintiffs,          14 v.          15 United States of America,          16 Defendant.</p>	<p>Case No. 5:15-cv-03251-BLF          STIPULATION OF DISMISSAL          AND <del>PROPOSED</del> ORDER</p>
--	--

17  
 18 Defendant the United States of America (“United States”), and Plaintiffs Bertram and Marie  
 19 Chan (“Plaintiffs”), by and through undersigned counsel, hereby stipulate, pursuant to Fed. R. Civ. P.  
 20 41(a)(1)(A)(ii), to the dismissal of this matter in its entirety with prejudice. Each party shall bear its  
 21 own costs and fees.

22  
 23  
 24  
 25  
 26  
 27  
 28

1 Respectfully submitted this 13th day of January 2016,

2 BRIAN J. STRETCH  
Acting United States Attorney

3 s/ Michael G. Pitman  
4 MICHAEL G. PITMAN  
Assistant United States Attorney

5 Attorneys for United States of America

6  
7 s/ Troy Douglas Renkemeyer  
8 TROY DOUGLAS RENKEMEYER  
Renkemeyer Law Firm, LP  
9 941 W. 141st Terrace, Suite B  
Kansas City, MO 64145  
10 913-906-9800  
Fax: 913-906-9840  
Email: trenkemeyer@rcwlawfirm.com

11 Attorney for Plaintiffs Bertram and Marie Chan

12  
13  
14 ~~PROPOSED~~ ORDER

15 Pursuant to the Stipulation of the parties pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), it is hereby  
16 ORDERED that this matter is dismissed, in its entirety, with prejudice. Each party shall bear its own  
17 costs and fees.

18  
19 SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2016.

20   
21 \_\_\_\_\_  
22 THE HONORABLE BETH LABSON FREEMAN  
23 UNITED STATES DISTRICT JUDGE  
24  
25  
26  
27  
28