		1	
1	Robert M. Bustamante, State Bar No. 11468	1	
2	Robert M. Gagliasso, State Bar No. 162082 BUSTAMANTE & GAGLIASSO, APC		
3	2150 Trade Zone Blvd, Suite 204 San Jose, California 95131		
4	Telephone: (408) 977-1911 Facsimile: (408) 977-0746		
5	rbustamante@boglawyers.com rgagliasso@boglawyers.com		
6	Attorneys for Plaintiff, Alan Chen		
7	John J. Verber, State Bar No. 139917 Aumee Hamoy-Perera, State Bar No. 221228		
8	BURNHAM BROWN A Professional Law Corporation		
9	A Professional Law Corporation P.O. Box 119 Oakland, California 94604		
10	1901 Harrison Street, 14th Floor		
11	Oakland, California 94612 Telephone: (510) 444-6800		
12	Facsimile: (510) 835-6666 Email: iverber@burnhambrown.com		
13	ahamoy-perera@burnhambrown.co	<u>m</u>	
14	Attorneys for Defendants		
15 16	BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY, OFFICER SEAN FARRELL, OFFICER JONATHON SILVA, OFFIER MUNIR EDAIS, OFFICER		
17	TASSIO, OFFICER BUCKOVIC		
18	TINITED CHAIN	Co Diembiem Collina	
19	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA		
20	SAN JO	SE DIVISION	
21	ALAN CHEN, an individual;	Case No.: 5:17-cv-02046-NC	
22	Plaintiff,	STIPULATION OF DISMISSAL	
23		FED. R. CIV P. §41(a)(1)(A);	
24	VS.	[PROPOSED] ORDER	
25	TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY, et al.,		
26	Defendants.		
27		1	
28	STIPULATION OF DISMISSAL FED. R. CIV P. §41(a)(1)(A);	1 Case No.: 5:17-cv-02046-NC	
	[PROPOSED] ORDER		

1	IT IS HEREBY STIPULATED by and between Plaintiff, Alan Chen, and Defendants,		
2	Board of Trustees of The California State University, Officer Sean Farrell, Officer Jonathon		
3	Silva, Officer Munir Edais, Officer Jaimee Tassio, and Officer Scott Buckovic, that in response		
4	to the settlement obtained and after having met and conferred, Plaintiff's First Amended		
5	Complaint and each cause of action should be dismissed with prejudice.		
6	Plaintiff's claims are dismissed with prejudice. All claims and parties dismissed by way		
7	of this Stipulation are in return for a waiver of fees and costs by all parties and pursuant to the		
8	terms addressed in the parties' Settlement Agreement. This Stipulation and Dismissal is brought		
9	pursuant to Federal Rule of Civil Procedure 41(a)(1)(A).		
10	IT IS SO STIPULATED.		
11			
12	Dated:, 2018	BUSTAMANTE & GAGLIASSO, A Professional Law	
13		Corporation	
14		/s/ Robert M. Bustamante	
15		ROBERT M. BUSTAMANTE ROBERT M. GAGLIASSO	
16		Counsel for Plaintiff, ALAN CHEN	
17			
18	Dated:, 2018	BURNHAM BROWN, A Professional Law	
19		Corporation	
20		/s/ John J. Verber	
21		JOHN J. VERBER	
22		AIMEE HAMOY-PERERA	
23		Attorneys for Defendants BOARD OF TRUSTEES OF THE CALIFORNIA	
24		STATE UNIVERSITY, OFFICER SEAN FARRELL, OFFICER JONATHON SILVA, OFFIER MUNIR	
25		EDAIS, OFFICER TASSIO, OFFICER BUCKOVIC	
26	//		
27	//	2	
28	STIPULATION OF DISMISSAL FED. R. CIV P. §4 [PROPOSED] ORDER	(1(a)(1)(A); Case No.: 5:17-cv-02046-NC	

[PROPOSED] ORDER

IT IS SO ORDERED THAT the stipulation is GRANTED.

Plaintiff's First Amended Complaint is dismissed with prejudice.

IT IS SO ORDERED.

Dated: <u>April 18</u>, 2018

