

1 DAVID R. ISOLA, SBN #150311
 2 e-mail: disola@isolalaw.com
 3 DOYLE GRAHAM, SBN #217033
 4 e-mail: fdgraham@isolalaw.com
 5 **ISOLA LAW GROUP, LLP**
 6 405 West Pine Street
 7 Lodi, CA 95240
 8 Tel: (209) 367-7055
 9 Fax: (209) 367-7056

10 Attorneys for: Plaintiffs IGOR GANDZJUK, ET AL.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 IGOR GANDZJUK, ET AL.,
 14 Plaintiffs,
 15 v.
 16 SUSAN STORM, ET AL.,
 17 Defendants.

Case No. 5:17-cv-04038-NC

18 STIPULATION FOR DISMISSAL AND
 19 ~~PROPOSED~~ ORDER FOR LIMITED
 20 CONTINUING JURISDICTION [FRCP
 21 41(a)(2)]

22 AND RELATED CROSS-ACTIONS.

*Honorable Magistrate Nathanael
 Cousins*

22 Plaintiffs/Counter-Defendants Igor Gandzjuk, Trustee of the George
 23 Gandzjuk and Kaleria Gandzjuk Trusts dated December 4, 1978; and Kaleria
 24 Gandzjuk and George Gandzjuk, individuals and through their successor in interest
 25 Igor Gandzjuk, and Defendants/Counterclaimants Susan Storm, Stosko Business
 26 Development, Inc., a California corporation, and the Estate of Joseph P. Storm,
 27 collectively the "Parties," hereby stipulate that all claims and counterclaims
 28 between them be dismissed with prejudice.

1 The Parties respectfully request that the Court maintain jurisdiction through
2 July 15, 2018 for the sole purpose of enforcing the payment provisions of the
3 Parties' settlement agreements.

4
5 Respectfully Submitted,

6 Dated: May 4, 2018

ISOLA LAW GROUP, LLP

7
8
9 By: /s/ David R. Isola
Counsel for Plaintiffs
Igor Gandzjuk, Trustee of the George
10 Gandzjuk and Kaleria Gandzjuk Trusts
dated December 4, 1978; and Kaleria
11 Gandzjuk and George Gandzjuk,
individuals and through their successor in
12 interest Igor Gandzjuk

13
14 Dated: May 4, 2018

GREBEN & ASSOCIATES

15
16 By: /s/ Jan Greben
Counsel for Defendants
17 Susan Storm, Stosko Business
Development, Inc., a California
18 corporation, and the Estate of Joseph P.
Storm

19
20
21 **CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES**

22 I, David R. Isola, am the ECF user whose ID and password are being used to
23 file this pleading. In compliance with USDC N.D. Cal. Civ. L.R. 5(i)(3), I hereby
24 attest that I have obtained the concurrence of each signatory to this document.

25
26
27 /s/ David R. Isola
David R. Isola

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

Based on the foregoing, the Court HEREBY ORDERS that all claims and counterclaims in this matter be dismissed with prejudice. The Court shall maintain jurisdiction through July 15, 2018 for the sole purpose of enforcing payment provisions in the Parties' settlement agreements.

IT IS SO ORDERED.

Date: May 4, 2018

