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10 Attorneys for Defendant SCRIBD, INC.

11 **UNITED STATES DISTRICT COURT**
 12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 LARRY WILLIAMS,)	CASE NO. 09-cv-1836-LAB-BGS
)	
14 Plaintiff,)	JOINT MOTION FOR DISMISSAL
vs.)	OF CLAIMS AGAINST
)	DEFENDANT SCRIBD, INC.
15 SCRIBD, INC., a corporation, GalaxiaMia sued as)	
16 DOE 1; api_user_11797_malvik as DOE 2;)	
alukmanto as DOE 3; api_user_11797_NEBOJSAJE)	
17 as DOE 4; mikaj as Doe 5; Srikanthbnm sued as)	
DOE 6; api_user_11797_Sathis sued as DOE 7;)	
18 api_user_11797_tevado... sued as DOE 8;)	
api_user_11797_ingrid... sued as DOE 9; and DOES)	
19 10 to 40 are upload infringers to be named,)	
)	
20 Defendants.)	

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1 Plaintiff Larry Williams (“Plaintiff”) and Defendant Scribd, Inc. (“Defendant” or
2 “Scribd”) respectfully submit this Joint Motion for Dismissal pursuant to Rule 41(a)(1) of the
3 Federal Rules of Civil Procedure. Plaintiff and Defendant hereby jointly move to dismiss with
4 prejudice all remaining claims in this action as to Defendant Scribd, based on a private,
5 confidential settlement agreement. The parties reached the settlement before Magistrate Judge
6 Bernard G. Skomal and consented to Judge Skomal’s retention of jurisdiction for the
7 enforcement of the settlement and all further action in this case. Accordingly, the parties
8 respectfully request that this Court dismiss Plaintiff’s remaining claims against Defendant Scribd
9 with prejudice *nunc pro tunc* to enforcement of the private settlement by Magistrate Judge
10 Skomal.

11
12 Respectfully submitted,

13 Dated: October 29, 2010

LAW OFFICES OF KURT W. HALLOCK

14 by s/Kurt W. Hallock/
15 Kurt W. Hallock
16 Attorney for Plaintiff
LARRY WILLIAMS

17 Dated: October 29, 2010

GORDON & REES LLP

18 by s/Richard P. Sybert/
19 Richard P. Sybert
20 Yuo-Fong C. Amato
21 Attorneys for Defendant
22 SCRIBD, INC.
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1 **Signature Certification**

2 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and
3 Procedures Manual, I hereby certify that the content of this document is acceptable to Richard P.
4 Sybert, counsel of record for Defendant Scribd, Inc., and that I have obtained Mr. Sybert's
5 authorization to affix his electronic signature to this document.

6 Dated: October 29, 2010

LAW OFFICES OF KURT W. HALLOCK

7 by s/Kurt W. Hallock/
8 Kurt W. Hallock
9 Attorney for Plaintiff
LARRY WILLIAMS

10 **PROOF OF SERVICE**

11 I, the undersigned, declare that I am over the age of eighteen years and not a party to
12 this action. I am employed in the County of San Diego where this service occurred. My
13 business address is 110 West "C" Street, Suite 1905, San Diego, California 92101. I
14 hereby certify that on October 29, 2010, I electronically transmitted:

15 1) Joint Motion for Dismissal of Claims Against Defendant Scribd, Inc.; 2) [Proposed]
16 Order Granting Joint Motion for Dismissal.

17 To the Clerk's Office pursuant to Electronic Case Filing Administrative Policies and
18 Procedures using the CM/ECF System for filing and transmittal of a Notice of Electronic
19 Filing to the Following CM/ECF registrants who have consented to electronic service
20 through the Court's transmission facilities:
21

22 Richard P. Sybert, e-mail: rsybert@gordonrees.com; Yuo-Fong C. Amato, e-mail:
23 bamato@gordonrees.com; Attorneys for Defendant Scribd, Inc.
24

25 I declare under penalty of perjury under the laws of the United States that the foregoing
26 is true and correct. Executed on October 29, 2010 at San Diego, CA.

27 _____s/Kurt W. Hallock_____
28 Kurt W. Hallock

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