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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT WILSON and ERIC McNEAL,
individually and on behalf of all similarly
situated individuals,

Plaintiffs,

v.

MAXIM HEALTHCARE SERVICES, INC.,
a Maryland corporation,

Defendant.

No. 2:14-cv-00789-RSL

**STIPULATED MOTION FOR
DISMISSAL AND ~~PROPOSED~~
ORDER**

NOTE ON MOTION CALENDAR:
July 10, 2017

STIPULATED MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 10(g),
Defendant Maxim Healthcare Services, Inc., together with Plaintiffs Robert Wilson and Eric
McNeal (collectively, the "Parties"), by and through the undersigned counsel, respectfully move
the Court to enter the stipulated Order as set forth below.

STIPULATION

The Parties hereby stipulate to the voluntary dismissal of the action in its entirety, *with
prejudice*, as to the following seventy-one (71) Named and Opt-in Plaintiffs:

1. Arenth, Andrew P

STIPULATED MOTION FOR DISMISSAL -- 1

MILLER NASH GRAHAM & DUNN PC
Pier 70, 2801 Alaskan Way ~ Ste. 300
Seattle, Washington 98121-1128
(206) 624-8300/Fax: (206) 340-9599

No. 2:14-cv-00789-RSL

- 1 2. Atobrah, Frederick
- 2 3. Batson, Brant D
- 3 4. Brandon, Kyle M
- 4 5. Brown II, Dennis Y
- 5 6. Brown, Jordan A
- 6 7. Bruce, Rachel M
- 8 8. Burgos, Marichelle G
- 9 9. Busjith, Sabina R
- 10 10. Centurion, Diego
- 11 11. Chambers, Brittney F
- 12 12. Clarke, Emile L
- 13 13. Coreth, Ian R
- 14 14. Drummond, Scott M
- 15 15. Farfan, William J
- 16 16. Flynn, Lesley A
- 17 17. Forgey, Ashley M
- 18 18. Gerencher, Jill E
- 19 19. Gillan, Troy M
- 20 20. Green, Michelle M
- 21 21. Greenslitt, Benjamin W
- 22 22. Hale, Jessica L

STIPULATED MOTION FOR DISMISSAL -- 2

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- 1 23. Hanle, Nathan A
- 2 24. Holcomb, Adam C
- 3 25. Hong, Thomas S
- 4 26. Horner, Monica A
- 5 27. Jackson, Kyle R
- 6 28. Johnson, Brandon L
- 7 29. Joustra, Jeremy E
- 8 30. Kent, Terrell J
- 9 31. Kephart, Tim
- 10 32. Khani, Jasmin L
- 11 33. King, Caitlin A
- 12 34. Klettke, Tara E
- 13 35. Kupiszewski, Stephen
- 14 36. Landry, Daniel P
- 15 37. Lanzone, Christine D
- 16 38. Lichter, Emily J
- 17 39. Ligon, Jeffrey B
- 18 40. Lipositz, Justin T
- 19 41. Mawhirter, David T
- 20 42. Mazzanti, Luke W
- 21 43. McMahon, Kelly E

STIPULATED MOTION FOR DISMISSAL -- 3

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- 1 44. McNeal, Eric A
- 2 45. Melton, Sara K
- 3 46. Moye, Katoya T
- 4 47. Musha, Erin E
- 5 48. Nelson, Kahley C
- 6 49. Neu, David M
- 7 50. Orlenko, Bryan J
- 8 51. Peyton, Kevin J
- 9 52. Phillips, Parker H
- 10 53. Ramirez, Laura
- 11 54. Romero, Manuel E
- 12 55. Rowley, Amara A
- 13 56. Ruebel, Jenna L
- 14 57. Ruggeberg, Joshua S
- 15 58. Salamone, Deborah A
- 16 59. Simmons, Brendon G
- 17 60. Simmons, Michelle D
- 18 61. Soto, Veronica A
- 19 62. Sparks, Branden M
- 20 63. Staden, Chantz D
- 21 64. Urena, Edwin S
- 22
- 23
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STIPULATED MOTION FOR DISMISSAL -- 4

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1 65. Vaughn, Colby A

2 66. Weigand, Robert J

3 67. Wilen, Steven M

4 68. Wilson, Emily B

5 69. Wilson, Robert J

6 70. Wolfe, Steven S

7 71. Woods, Kevin P

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9
10 These dismissals are warranted because the Named-Plaintiffs and Opt-In Plaintiff s
11 identified above have resolved their claims through individual settlement agreements with
12 Defendant.¹

13
14 **SO STIPULATED:**

15 By: /s/ Jesse L. Young

16 Jason J. Thompson

17 Jesse L. Young

18 SOMMERS SCHWARTZ PC

19 One Towne Square, Ste. 1700

20 Southfield, MI 48076

21 Tel: (248) 355-0300

22 Email: jthompson@sommerspc.com

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24 By: /s/ Jacob R. Rusch

25 Jacob R. Rusch

26 JOHNSON BECKER, PLLC

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Minneapolis, MN 55413

Tel: (612) 436-1800

By: /s/ Thomas F. Hurka

Thomas F. Hurka, Pro Hac Vice

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Email: thomas.hurka@morganlewis.com

By: /s/ Kaiser H. Chowdhry

Lincoln O. Bisbee, Pro Hac Vice

Kaiser H. Chowdhry, Pro Hac Vice

Amanda C. Dupree, Pro Hac Vice

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Ave., NW

Washington, DC 20004

¹ Excluded from the instant motion are three remaining Opt-In Plaintiffs— Michael Crother, Taysir Yamin, and Paulette Jackson. The parties expect that their claims, too, will be resolved in the near future. The parties will update the Court accordingly.

1 Email: jrusch@johnsonbecker.com

2 By: /s/ Rebecca J. Roe

3 Rebecca J. Roe

4 Adam J. Berger

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6 BENDER

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By: /s/ Clemens H. Barnes

Clemens H Barnes

Daniel J. Oates

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*Attorneys for Defendant Maxim Healthcare
Services, Inc.*

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STIPULATED MOTION FOR DISMISSAL -- 6

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ORDER

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IT IS SO ORDERED.

Dated this 11th day of July, 2017.



The Honorable Robert S. Lasnik
United States District Judge

STIPULATED MOTION FOR DISMISSAL -- 9

MILLER NASH GRAHAM & DUNN PC
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