

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

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:
August 7, 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 remaining three Opt-in Plaintiffs: **Taysir Yamin, Paulette Jackson, and
Michael Crother**. Mr. Yamin's and Ms. Jackson's dismissals are warranted because they have

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 resolved their claims through individual settlement agreements with Defendant. Mr. Crother is
2 deceased and his family members have informed Plaintiffs' counsel in writing that they will not
3 pursue a letter of authority to effectuate his settlement agreement. As such, his dismissal is
4 warranted, too.

5 With these dismissals, all remaining claims in this action have now been dismissed and,
6 as such, the matter may be closed.

7
8 **SO STIPULATED:**

9 By: /s/ Jason J. Thompson

10 Jason J. Thompson
11 Jesse L. Young
12 SOMMERS SCHWARTZ PC
13 One Towne Square, Ste. 1700
14 Southfield, MI 48076
15 Tel: (248) 355-0300
16 Email: jthompson@sommerspc.com
17 Email: jyoung@sommerspc.com

18 By: /s/ Jacob R. Rusch

19 Jacob R. Rusch
20 JOHNSON BECKER, PLLC
21 33 South Sixth Street, Ste. 4530
22 Minneapolis, MN 55413
23 Tel: (612) 436-1800
24 Email: jrusch@johnsonbecker.com

25 By: /s/ Rebecca J. Roe

26 Rebecca J. Roe
Adam J. Berger
SCHROETER GOLDMARK &
BENDER
810 Third Ave., Ste. 500
Seattle, WA 98104
Tel: (206) 622-8000
Email: roe@sgb-law.com
Email: berger@sgb-law.com

Attorneys for Plaintiffs

By: /s/ Thomas F. Hurka

Thomas F. Hurka, Pro Hac Vice
MORGAN, LEWIS & BOCKIUS LLP
77 W. Wacker Drive, Fifth Floor
Chicago, IL 60601
Tel: (312) 324-1000
Email: thomas.hurka@morganlewis.com

By: /s/ Kaiser H. Chowdry

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
Tel: (202) 739-3000
Email: lincoln.bisbee@morganlewis.com
Email: kaiser.chowdhry@morganlewis.com
Email: amanda.dupree@morganlewis.com

By: /s/ Clemens H. Barnes

Clemens H Barnes
Daniel J. Oates
MILLER NASH GRAHAM & DUNN LLP
(SEA)
2801 Alaskan Way
Suite 300 Pier 70
Seattle, WA 98121-1128
(206) 777-7432
(206) 777-7537
Email: clem.barnes@millernash.com
Email: dan.oates@millernash.com

ORDER

IT IS SO ORDERED.

Dated this 10 day of August, 2017.



The Honorable Robert S. Lasnik
United States District Judge