

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 JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

OCTAVIO ORTEGA,  
Plaintiff,

v.

AMERICAN SHIP MANAGEMENT, in  
personam the M/V MOKU PAKU, Official  
Number 002090, her engines, machinery,  
appurtenances and cargo, in rem,  
Defendants.

AT LAW AND AT ADMIRALTY

No. 2:17-cv-00069-JLR

STIPULATION AND  
~~PROPOSED~~ ORDER OF DISMISSAL  
WITH PREJUDICE

STIPULATION

Plaintiff Octavio Ortega and Defendant American Ship Management, LLC, by and through their respective counsel, hereby stipulate and agree that all claims which have been asserted in this action by Plaintiff against Defendant have been settled and shall be dismissed with prejudice and without costs to any party. The parties request that the Court enter the below proposed Order dismissing this action with prejudice.

DATED this 17<sup>th</sup> day of July, 2017.

LAW OFFICE OF JOHN MERRIAM

NICOLL BLACK & FEIG PLLC

John W. Merriam, WSBA#12749  
Attorney for Plaintiff

/s/ W.L. Rivers Black  
W.L. Rivers Black, WSBA No. 13386  
Jeremy B. Jones, WSBA No. 44138  
Attorneys for Defendant American Ship  
Management

STIPULATION AND [PROPOSED] ORDER  
OF DISMISSAL WITH PREJUDICE - 1  
(2:17-cv-00069-JLR)

LAW OFFICES OF  
NICOLL BLACK & FEIG PLLC  
1325 FOURTH AVENUE  
SUITE 1650  
SEATTLE, WASHINGTON 98101  
(206) 838-7555

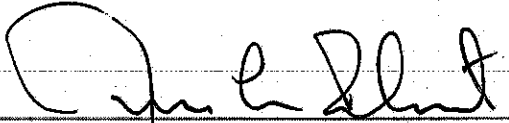
[PROPOSED] ORDER

Based upon the foregoing stipulated motion, and the Court being fully advised in the premises, NOW, THEREFORE,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that all claims by Plaintiff against Defendant American Ship Management are dismissed with prejudice and without costs to any party.

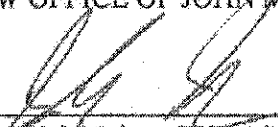
This is a final order resolving this cause number.

DATED this 17<sup>th</sup> day of July, 2017

  
United States Judge

Presented by:

LAW OFFICE OF JOHN MERRIAM

  
John W. Merriam, WSBA#12749  
4005 20th Avenue West, Suite 110  
Seattle, WA 98199  
Telephone: (206) 729-5252  
Fax: (206) 729-1012  
E-mail: john@merriam-maritimelaw.com  
Attorney for Plaintiff

NICOLL BLACK & FEIG PLLC

/s/ W.L. Rivers Black  
W.L. Rivers Black, WSBA No. 13386  
Jeremy B. Jones, WSBA No. 44138  
Attorneys for Defendant American Ship Management