

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

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

JULIE ROBERTS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

**PREMIER TECHNOLOGY SERVICES,
LLC dba REALISTIQ**, a Nevada limited
liability company,

Defendant.

CASE NO.: 2:17-cv-00648

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH
PREJUDICE WITH RESPECT TO
THE INDIVIDUAL CLAIMS AND
WITHOUT PREJUDICE WITH
RESPECT TO THE CLASS-ACTION
CLAIMS**

STIPULATION

Plaintiff, Julie Roberts, individually, and Defendant, Premier Technology Services, LLC dba realistiQ, by and through undersigned counsel, hereby advise the Court that the parties have reached a settlement of their claims, and therefore dismiss Plaintiff's individual claims asserted in this civil action, with prejudice, and *without* prejudice with respect to the putative Class claims, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). The parties are to bear their own respective attorneys' fees and costs.

In support of this Stipulation, the Parties jointly attest that the putative Class members will not be prejudiced by the dismissal of this action because, to the best of the Parties' knowledge, 1)

STIPULATION AND ~~PROPOSED~~ ORDER OF DISMISSAL
2:17-cv-00648

Law Offices of Stefan Coleman
1011 W. Colter St., #236
Phoenix, Arizona 85013
602.441.3704

1 no putative Class member has relied on this action as no notices have been distributed and there
2 has been no advertisement or publicity of this action; 2) the statute of limitations will not expire
3 for several years; and 3) the Parties' agreement does not settle or concede any interests of the
4 putative Classes. *See Diaz v. Trust Territory of Pac. Islands*, 876 F.2d 1401, 1408 (9th Cir.1989).

5
6
7 Dated: June 29, 2017

By: /s/Blake J. Dugger
One of Plaintiff's Attorneys

8
9 Blake J. Dugger*
blake@stefancoleman.com
10 LAW OFFICES OF STEFAN COLEMAN, P.A.
1011 W. Colter St., #236
11 Phoenix, Arizona 85013
Telephone: (602) 441-3704
12 Facsimile: (888) 498-8946
Attorney for Plaintiff and the Classes
13 *Pro Hac Vice

14 Dated: June 29, 2017

15 By /s James D. Nelson
16 By /s Shaina R. Johnson
17 By /s Natalie A. Moore
James D. Nelson, WSBA #11134
Shaina R. Johnson, WSBA #46079
Natalie A. Moore, WSBA #45333
18 BETTS, PATTERSON & MINES, P.S.
19 One Convention Place, Suite 1400
701 Pike Street
20 Seattle WA 98101-3927
Telephone: (206) 292-9988
21 Facsimile: (206) 343-7053
E mail: jnelson@bpmlaw.com
22 E mail: sjohnson@bpmlaw.com
E mail: nmoore@bpmlaw.com
23 Attorneys for Defendant Premier Technology
24 Services, LLC dba realistiQ

ORDER

Pursuant to the foregoing Stipulation, it is hereby

ORDERED, ADJUDGED AND DECREED that the that the above-captioned proceeding is hereby DISMISSED WITH PREJUDICE with respect to the Plaintiff's claims and without prejudice with respect to the putative Class claims and without costs to any party.

DATED this 6th day of July, 2017.

M. S. Lasnik
UNITED STATES DISTRICT JUDGE

Presented by:

By: /s/Blake J. Dugger
One of Plaintiff's Attorneys

Blake J. Dugger*
blake@stefancoleman.com
LAW OFFICES OF STEFAN COLEMAN, P.A.
1011 W. Colter St., #236
Phoenix, Arizona 85013
Telephone: (602) 441-3704
Facsimile: (888) 498-8946
Attorney for Plaintiff and the Classes
**Pro Hac Vice*

BETTS PATTERSON & MINES

By: /s/James D. Nelson
By: /s/Shaina R. Johnson
By: /s/Natalie A. Moore
James D. Nelson, WSBA #11134
Shaina R. Johnson, WSBA #46079
Natalie A. Moore, WSBA #45333
Betts, Patterson & Mines P.S.
One Convention Place, Suite 1400
701 Pike Street
Seattle, WA 98101-3927
Telephone: (206) 292-9988
Facsimile: (206) 343-7053
E-mail: jnelson@bpmlaw.com
E-mail: sjohnson@bpmlaw.com
E-mail: nmoore@bpmlaw.com
Attorneys for Defendant Premier Technology
Services, LLC dba realistiQ