

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DONNA FOLIART, Individually and as
Personal Representative for the Estate of
JAMES R. FOLIART

Plaintiffs,

vs.

UNITED STATES OF AMERICA; MEDICAL
DOCTOR ASSOCIATES, LLC; LINDA
MARIE CINTRON, MD; and UNKNOWN
JOHN DOES and JOHN DOE CLINICS,

Defendants.

No. 2:17-cv-01325-RSL

STIPULATION AND ORDER OF
DISMISSAL OF ALL CLAIMS WITH
PREJUDICE

STIPULATION TO DISMISSAL WITH PREJUDICE

COMES NOW plaintiff Donna Foliart, Individually and as Personal Representative for the Estate of James Foliart, defendants United States of America, Medical Doctor Associates, LLC, and Linda Marie Cintron, MD, by and through their respective undersigned attorneys and, pursuant to FRCP 41(a)(1), hereby stipulate that all of plaintiff's claims and causes of action against all defendants should be dismissed with prejudice, and without fees or costs to any party.

A proposed order is submitted below.

1 LAW OFFICES OF GEORGE
KARGIANIS

2 By: s/George Kargianis
3 GEORGE KARGIANIS, WSBA #286

4 225 106th Avenue NE
5 Bellevue, Washington 98004
6 Telephone: (206) 624-5370
7 Email: George@kargianislaw.com
8 Counsel for Plaintiff

9 LAW OFFICE OF NEIL T. LINDQUIST

10 By: s/Neil T. Lindquist
11 NEIL T. LINDQUIST, WSBA #52111

12 1204 N 10th Pl., Suite 2345
13 Renton, WA. 98057
14 Telephone: (425) 372-7799
15 Email: Neil@LindquistLegal.Com
16 Counsel for Plaintiff

17 UNITED STATES ATTORNEY'S OFFICE

18 By: s/Tricia Boerger
19 BRIAN T. MORAN, WSBA #17794
20 United States Attorney for the Western
21 District of Washington

22 TRICIA BOERGER, WSBA #38581
23 Assistant United States Attorney for the
Western District of Washington

United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Telephone: (206) 553-7970
Email: tricia.boerger@usdoj.gov

Counsel for Defendant United States
of America

STIPULATION AND ORDER OF DISMISSAL OF
ALL CLAIMS WITH PREJUDICE - Page 2
02452-070\Stipulation and Order of Dismissal with Prejudice.docx

WEBB LAW FIRM

By: s/Gordon C. Webb
GORDON C. WEBB, WSBA #22777

225 106th Ave. North East
Bellevue, Washington 98004
Telephone: (425) 454-3800
Email: Gordon@webblawfirm.net
Counsel for Plaintiff

BENNETT BIGELOW & LEEDOM

By: s/Elizabeth A. Leedom
ELIZABETH A. LEEDOM, WSBA #14335

By: s/David M. Norman
DAVID M. NORMAN, WSBA #40564

601 Union Street, Ste. 1500
Seattle, WA 98101
Phone: (206) 622-5511
eleedom@bblaw.com
dnorman@bblaw.com
Counsel for Defendant Linda Marie Cintron,
MD and Medical Doctor Associates, LLC

1
2 **ORDER**

3 Based on the foregoing stipulation between the parties, it is hereby ORDERED,
4 ADJUDGED and DECREED as follows:

5 Any and all of plaintiff's claims against all defendants, that were or could have been
6 asserted in this action, are dismissed with prejudice and without fees or costs to any person.

7 Dated this 10th day of July, 2019.

8 
9 The Honorable Robert S. Lasnik

10 Presented by:

11 LAW OFFICES OF GEORGE KARGIANIS

12 By: *s/George Kargianis*
13 GEORGE KARGIANIS, WSBA #286

14 225 106th Avenue NE
15 Bellevue, Washington 98004
16 Telephone: (206) 624-5370
17 Email: George@kargianislaw.com
18 Counsel for Plaintiff

19 WEBB LAW FIRM

20 By: *s/Gordon C. Webb*
21 GORDON C. WEBB, WSBA #22777

22 225 106th Ave. North East
23 Bellevue, Washington 98004
Telephone: (425) 454-3800
Email: Gordon@webblawfirm.net
Counsel for Plaintiff

1 LAW OFFICE OF NEIL T. LINDQUIST

2
3 By: s/Neil T. Lindquist
NEIL T. LINDQUIST, WSBA #52111

4 1204 N 10th Pl., Suite 2345
5 Renton, WA. 98057
6 Telephone: (425) 372-7799
Email: Neil@LindquistLegal.Com
Counsel for Plaintiff

7 BENNETT BIGELOW & LEEDOM

8 By: s/Elizabeth A. Leedom
ELIZABETH A. LEEDOM, WSBA #14335

9 By: s/David M. Norman
10 DAVID M. NORMAN, WSBA #40564

11 601 Union Street, Ste. 1500
12 Seattle, WA 98101
13 Phone: (206) 622-5511
leedom@bblaw.com
dnorman@bblaw.com
14 Counsel for Defendant Linda Marie Cintron, MD
15 and Medical Doctor Associates, LLC

16 UNITED STATES ATTORNEY'S OFFICE

17 By: s/Tricia Boerger
18 BRIAN T. MORAN, WSBA #17794
United States Attorney for the Western District of Washington
19 TRICIA BOERGER, WSBA #38581
Assistant United States Attorney for the
20 Western District of Washington

21 United States Attorney's Office
22 700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
23 Telephone: (206) 553-7970
Email: tricia.boerger@usdoj.gov

Counsel for Defendant United States
of America