

1 SPRETER LEGAL SERVICES APC
Geoffrey Spreter (SBN 257707)
2 601 Third Street
Coronado, CA 92118
3 Telephone: (619) 865-7986
Email: spreterlegalservices@gmail.com

4 Attorney for Plaintiff JEANNE BURNS

5 VENABLE LLP
6 Jennifer Levin (SBN 252420)
Melissa C. McLaughlin (SBN 273619)
7 2049 Century Park East, Suite 2100
Los Angeles, CA 90067
8 Telephone: (310) 229-9900
Facsimile: (310) 229-9901
9 Email: jlevin@venable.com
mcmclaughlin@venable.com

10 Attorneys for Defendant TRISTAR
11 PRODUCTS, INC.

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14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**
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17
18 Jeanne Burns, individually and on
behalf of all others similarly situated,

19 Plaintiffs,

20 v.

21 Tristar Products, Inc., a Pennsylvania
Corporation, and Does 1 through 50,
22 inclusive.

23 Defendant.

CASE NO. 2:14-cv-00749-BAS (DHBx)

Hon. David H. Bartick

**JOINT MOTION FOR DISMISSAL
OF ENTIRE ACTION WITH
PREJUDICE**

1 Pursuant to Fed. R. Civ. P. 41(a), the parties to this action, Plaintiff Jeanne
2 Burns (“Plaintiff”) and Defendant Tristar Products, Inc. (“Defendant”) hereby
3 stipulate to, and jointly move this Court for, an order dismissing all claims in this
4 action with prejudice, without costs to any party as against another.

5 DATED: November 20, 2014

SPRETER LEGAL SERVICES APC

6
7 By: /s/ Geoffrey Spreter

8 Geoffrey Spreter
9 Attorney for Plaintiff Jeanne Burns

10 DATED: November 20, 2014

VENABLE LLP

11 By: /s/ Jennifer Levin

12 Jennifer Levin
13 Attorney for Defendant TRISTAR
14 PRODUCTS, INC.

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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Ms. Jennifer Levin, counsel for defendant, and that I have obtained Ms. Levin’s authorization to affix her electronic signature to this document.

DATED: November 20, 2014

SPRETER LEGAL SERVICES APC

By: /s/ Geoffrey Spreter

Geoffrey Spreter
Attorney for Plaintiff Jeanne Burns

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of November, 2014, I caused a true and correct copy of the foregoing document(s) described as **JOINT MOTION FOR DISMISSAL OF ENTIRE ACTION WITH PREJUDICE** to be filed with the Clerk of the Court through the U.S. District Court Electronic Court Filing System, which caused notice of such filing to be sent electronically to the registered attorneys of record.

DATED: November 20, 2014

SPRETER LEGAL SERVICES APC

By: /s/ Geoffrey Spreter
Geoffrey Spreter
Attorney for Plaintiff Jeanne Burns