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Counsel for Defendant, Medora Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**KARISA NGUYEN, PEARLINE,
BLACKWOOD, and ANDRE
VANDENBERG**, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

MEDORA HOLDINGS, LLC,

Defendant.

CASE NO.: CV 14-00618-PSG

JUDGE: HON. PAUL S. GREWAL

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

WHEREAS, Plaintiffs Karisa Nguyen, Pearline Blackwood, and Andre Vandenberg (“Plaintiffs”), and Defendant, Medora Holdings, LLC (“Defendant”) (collectively Plaintiff and Defendant are referred to herein as the “Parties”), by and through their undersigned counsel, jointly submit this Stipulation of Dismissal with Prejudice, pursuant to *Federal Rule of Civil Procedure* 41(a)(1)(A)(ii).

1 **WHEREAS**, the Parties agree that this matter should now be dismissed with prejudice.

2 **WHEREAS**, the Parties agree that Plaintiff and Defendant shall each be responsible for
3 only their own attorneys' fees and costs.

4 **IT IS HEREBY STIPULATED** that the above-captioned case should be dismissed with
5 prejudice with each side bearing their own attorneys' fees and costs.

6 **IT IS SO STIPULATED AND AGREED.**

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Respectfully submitted,

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Dated: August 31, 2015

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By: /s/ Benjamin M. Lopatin

Benjamin M. Lopatin, Esq.

Cal. Bar No.: 281730

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-and-

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Dated: August 31, 2015

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/s/ Robert L. Wallan

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7 *Counsel for Defendant, Medora Holdings, LLC*

8 **ATTESTATION**

9 I hereby attest that I have on file written authorization for any signatures indicated by a
10 “conformed” signature (/s/) in this e-filed document.

11 */s/ Benjamin M. Lopatin*
12 Benjamin M. Lopatin

13 **CERTIFICATE OF SERVICE**

14 The undersigned certifies that on September 1, 2015, the foregoing was electronically
15 filed with the Clerk of the Court using the CM/ECF system, which will send copies to all counsel
16 of record.

17 */s/ Benjamin M. Lopatin*
18 Benjamin M. Lopatin

19 **~~PROPOSED~~ ORDER**

20 Pursuant to the foregoing stipulation, it is so ordered.

21 Dated: September 1, 2015

22 *Paul S. Grewal*
23 The Honorable Paul Singh Grewal
24 United States Magistrate Judge
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