

Kazerouni Law Group, APC
Costa Mesa, California

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

<p>SAMMER ZAKHOUR AND JOHN MARTINEZ; INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,</p> <p>Plaintiff,</p> <p>v.</p> <p>THE ISOPURE COMPNAY, LLC,</p> <p>Defendant.</p>	<p>Case No.: 3:15-cv-02512-CAB-NLS</p> <p>JOINT STIPULATION TO DISMISS</p> <p>Judge: Hon. Cathy Ann Bencivengo Mag. Judge: Hon. Nita L. Stormes</p>
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1 IT IS HEREBY STIPULATED AND AGREED by and between plaintiffs
2 Sammer Zakhour and John Martinez and defendant The Isopure Company, LLC,
3 and their respective counsel, that the above-captioned action is voluntarily
4 dismissed in its entirety, WITHOUT PREJUDICE as to all defendants, pursuant to
5 Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure; each side is to bear
6 their own fees and costs.

7
8 Respectfully submitted,

9 **KAZEROUNI LAW GROUP, APC**

10 Date: March 21, 2016

11 By: /s/ Abbas Kazerounian
12 Abbas Kazerounian
13 *Attorney for Plaintiffs*

14
15 Date: March 21, 2016

16 **REED SMITH, LLP**

17 By: /s/ Thomas Evans
18 Thomas A. Evans
19 *Attorney for Defendant*
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14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 **SAMMER ZAKHOUR AND JOHN**
17 **MARTINEZ; INDIVIDUALLY**
18 **AND ON BEHALF OF ALL**
OTHERS SIMILARLY
19 **SITUATED,**

20 Plaintiffs,

21 v.

22 **THE ISOPURE COMPNAY, LLC,**

23
24 Defendant.
25

Case No.: 3:15-cv-02512-CAB-NLS

**PROOF OF SERVICE TO JOINT
STIPULATION TO DISMISS**

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PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kazerouni Law Group, APC, 245 Fischer Ave, Unit D1, Costa Mesa, CA 92626. On March 21, 2016, I served the within document(s):

JOINT STIPULATION TO DISMISS.

- CM/ECF - by transmitting electronically the document(s) listed above to the electronic case filing system on this date before 11:59 p.m. The Court's CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record who are registered with the Court's CM/ECF system.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on March 21, 2016, in Costa Mesa, California.

By: /s/ Abbas Kazerounian
ABBAS KAZEROUNIAN, ESQ.