

1 Barbara A. Rohr (SBN 273353)
Benjamin Heikali (SBN 307466)
2 **FARUQI & FARUQI, LLP**
10866 Wilshire Boulevard, Suite 1470
3 Los Angeles, CA 90024
Telephone: 424. 256.2884
4 E-mail: brohr@faruqilaw.com
bheikali@faruqilaw.com

5 *Attorneys for Plaintiff Cyrus Hashtpari*

6 Amy B. Alderfer (SBN 205482)
7 **COZEN O’CONNOR**
601 S. Figueroa St., Suite 3700
8 Los Angeles, CA 90017
Telephone: 213.892.7900
9 E-mail: aalderfer@cozen.com

10 **RICHARD FAMA**, (admitted *Pro Hac Vice*)
COZEN O’CONNOR
11 45 Broadway Atrium, Suite 1600
New York, NY 10006
12 Telephone: 212.908.1229
E-mail: rfama@cozen.com

13 *Attorneys for Defendant*

14
15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA

17 CYRUS HASHTPARI, Individually
and on Behalf of All Others Similarly
18 Situated,

19 Plaintiff,

20 v.

21 UTZ QUALITY FOODS, INC.

22 Defendant.

CASE NO. 2:16-cv-3453

CLASS ACTION

Honorable Percy Anderson

**STIPULATION OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(ii)**

1 This Stipulation is entered into between and among Plaintiff Cyrus Hashtpari
2 (“Plaintiff”), through his counsel of record, and Defendant Utz Quality Foods, Inc.
3 (hereinafter, “UTZ”), through its counsel of record, and pursuant to Federal Rule of
4 Civil Procedure 41(a)(1)(A)(ii) whereby Plaintiff and UTZ stipulate to the dismissal
5 of the above-captioned class action without prejudice of all claims for relief asserted
6 by Plaintiff. Under Fed. R. Civ. P. 41(a)(1)(A)(ii), a stipulation of voluntary dismissal
7 without prejudice that is signed by all of the parties who have appeared in an action
8 may be entered without a court order. This stipulation of dismissal shall not affect the
9 class allegations in this action as this voluntary dismissal is without prejudice.
10 Further, notice to the putative class members is not necessary since it is being
11 requested before any class certification motion has ever been filed or decided.

12 The parties shall each bear their own costs, fees and expenses of any type.

13 IT IS SO STIPULATED.

14
15 DATED: August 8, 2016

BARBARA A. ROHR
FARUQI & FARUQI, LLP

16
17
18 By: /s/ Barbara A. Rohr
Barbara A. Rohr
Attorneys for Plaintiff
19 CYRUS HASHTPARI

20 DATED: August 8, 2016

AMY B. ALDERFER
COZEN O’CONNOR

21
22
23 By: /s/ Amy B. Alderfer
Amy B. Alderfer
Attorneys for Defendant
24 UTZ QUALITY FOODS, INC.
25
26
27
28

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

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have e-mailed the foregoing document to the non-CM/ECF participants indicated on the Manual Notice List.

Dated: August 8, 2016

/s/ Barbara A. Rohr
Barbara A. Rohr