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7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TED SHIMONO, on behalf of himself, all) Case No. 5:16-cv-01052 CAS (MRWx)
11 others similarly situated, and the general)
12 public,) CLASS ACTION

13 Plaintiff,)

14 vs.)

15 HARBOR FREIGHT TOOLS USA,)
16 INC.,)

17 Defendant.)

18 **JOINT STIPULATION FOR**
19 **DISMISSAL OF ACTION**
20 **PURSUANT TO FEDERAL RULE**
21 **OF CIVIL PROCEDURE**
22 **41(a)(1)(A)(ii)**

23 Judge: Hon. Christina A. Snyder
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1 **WHEREAS**, Federal Rule of Civil Procedure 41(a)(1)(A)(ii) states that:
2 “the plaintiff may dismiss an action without a court order by filing:.. (ii) a
3 stipulation of dismissal signed by all parties who have appeared.”

4 **WHEREAS**, the Parties agree to dismiss Plaintiff Ted Shimono's individual
5 claims, **WITH PREJUDICE**, and his class action claims, if any, **WITHOUT**
6 **PREJUDICE**, pursuant to the terms the Parties' confidential settlement agreement.

7 **NOW THEREFORE**, the Parties respectfully request that the Court enter
8 an Order dismissing Plaintiff Shimono's individual claims **WITH PREJUDICE** and
9 his class action claims, if any, **WITHOUT PREJUDICE**.

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11 **IT IS SO STIPULATED:**

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13 Dated: May 11, 2017

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Respectfully submitted,

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/s/ Ronald A. Marron

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Ronald A. Marron

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Dated: May 11, 2017

/s/ Rodger L. Eckelberry

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CERTIFICATION OF APPROVAL OF CONTENT

Counsel for Plaintiff, Ronald A. Marron, certifies that, pursuant to Section 2.f.4. of the Court’s CM/ECF Administrative Policies, Defendant’s counsel has reviewed the contents of this Stipulation for dismissal of this action and authorized placement of his electronic signature on this document.

Dated: May 11, 2017

s/ Ronald A. Marron
Ronald A. Marron
Attorney for Plaintiff

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TED SHIMONO, on behalf of himself, all) Case No. 5:16-cv-01052 CAS (MRWx)
11 others similarly situated, and the general)
12 public,) CLASS ACTION
13 Plaintiff,)
14 vs.) **[PROPOSED] ORDER**
15 HARBOR FREIGHT TOOLS USA,) **DISMISSING CASE PURSUANT**
16 INC.,) **TO FEDERAL RULE OF CIVIL**
17 Defendant.) **PROCEDURE 41(a)(1)(A)(ii)**
18 Judge: Hon. Christina A. Snyder
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Presently before the Court is the Parties' Joint Stipulation for Dismissal of Action Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Having read and considered the Parties' Joint Stipulation, and for good cause appearing, the Court hereby **DISMISSES** this action **WITH PREJUDICE** as to Plaintiff Shimono's individual claims and **WITHOUT PREJUDICE** as to Plaintiff Shimono's class action claims, if any.

IT IS SO ORDERED:

Dated: _____, 2017

Hon. Christina A. Snyder
United States District Court Judge