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5	Attorneys for Defendant, DUTCH, LLC, a Ca	Attorneys for Defendant, DUTCH, LLC, a California Limited Liability Company	
6 7	DEL MAR LAW GROUP, LLP John Donboli (SBN # 205218) 12250 El Camino Real, Suite 120 San Diego, California 92130		
8	San Diego, California 92130 Telephone: (858) 793-6244 Facsimile: (858) 793-6005		
9 10	Attorneys for Plaintiff, SONIA HOFMANN, an individual and all others similarly situated.		
11	UNITED STATES DISTRICT COURT		
12	FOR THE SOUTHERN DISTRICT OF CALIFORNIA		
13	TOR THE SOCIHERIV DISTRICT OF CHERTORIVITY		
14	SONIA HOFMANN, an individual \ CA	ASE No: 3:14cv2418-GPC (JLB)	
15	and on behalf of all others similarly situated, JO	OINT MOTION BY	
16		<u>TIPULATION</u> OF ALL PARTIES	
17	/ · · · · · · · · · · · · · · · · · · ·	D DISMISS CASE WITHOUT REJUDICE	
18		AEJUDICE	
19	DUTCH, LLC, a California Limited		
20	Liability Company; and DOES 1 through 100, inclusive,	al Date: None Set	
21	}		
22	Defendants.		
23	Plaintiff Hofmann and Defendant DUT	CH IIC hereby jointly apply to this	
2425	Plaintiff Hofmann and Defendant DUTCH, LLC hereby jointly apply to this Honorable Court by way of a joint motion to dismiss the above-captioned case		
26	without prejudice based on the following:		
27	1. WHEREAS, Plaintiff filed her Complaint in this case on or about		
28	September 5, 2014 in San Diego Superior Court (the "State Court Action");		
20	,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,,		
	JOINT MOTION OF PARTIES TO DISMISS CASE WITHOUT PREJUDICE		

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- WHEREAS, Defendants removed the State Court Action to this 2. Court on or about October 10, 2014;
- 3. WHEREAS, the parties filed their third motion for preliminary approval of class action settlement that was denied by this Court on or about March 3, 2017;
- WHEREAS, the parties recently began discussing how the 2016 4. amendment by the California legislature to the California "Made in USA" statute (codified at Business & Professions Code Section 17533.7) may affect the continued litigation;
- WHEREAS, after lengthy discussions between the parties and to 5. avoid potentially needless motion practice between the parties, the parties seek a dismissal of this action without prejudice.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants, through their respective counsels, that this case should be dismissed without prejudice pursuant to Federal Rule of Civil Procedure, Rule 41(a)(1). Plaintiff and Defendants shall bear their own costs and attorneys' fees in ///

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Case β :14-cv-02418-GPC-JLB Document 54 Filed 04/03/17 PageID.712 Page 3 of 4

CERTIFICATE OF SERVICE 1 2 (DUT.100) Sonia Hofmann v. Dutch, LLC United States District Court- Southern District of California; CASE No: 3 14cv2418-GPC (JLB) 4 5 I am employed in the county of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within entitled action; my business 6 address is 100 N. Barranca Avenue, Suite 1100, West Covina, California 91791. 7 On April 3, 2017, I served the foregoing document(s) described as JOINT 8 MOTION BY STIPULATION OF ALL PARTIES TO DISMISS CASE 9 WITHOUT PREJUDICE, as follows: 10 PLEASE SEE SERVICE LIST 11 12 (XX) BY CM/ECF NOTICE OF ELECTRONIC FILING: I filed the 13 document(s) with the Clerk of the Court by using the CM/ECF system. 14 Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users 15 will served by mail or by other means permitted by the court rules. 16 17 (XX) FEDERAL: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 18 19 Executed on April 3, 2017, at West Covina, California. 20 21 /s/ Mitchell J. Freedman Mitchell J. Freedman 22 23 24 25 26 27 28