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

19 ANTHONY BUSO, individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 JUST BORN, INC., a Pennsylvania
24 corporation; and DOES 1 through 10,
inclusive,

25 Defendants.

Case No. 3:17-cv-01630-JAH-JMA

**JOINT MOTION FOR DISMISSAL
OF ALL CLAIMS WITHOUT
PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(ii)**

1 TO THE COURT AND ALL PARTIES:

2 Plaintiff Anthony Buso and Defendant Just Born, Inc. hereby jointly request that
3 the Court dismiss this Action without prejudice in its entirety pursuant to Fed. R. Civ. P.
4 41(a)(1)(A)(ii). Each party is to bear its own fees and costs.

5
6 Date: October 18, 2017

Respectfully submitted,

7 PACIFIC TRIAL ATTORNEYS
8 A Professional Corporation

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10 By: /s/Scott J. Ferrell
11 Scott J. Ferrell
Attorneys for Plaintiff

12 LEWIS BRISBOIS BISGAARD &SMITH LLP

13
14
15 By: /s/Eric Y Kizirian
16 Eric Y. Kizirian
Attorneys for Defendant

17 I, Scott J. Ferrell, hereby certify that the content of this document is acceptable to
18 all persons required to sign this document and that I obtained the authorizations
19 necessary for the electronic signatures of all parties for this document.

20
21 /s/ Scott J. Ferrell
22 Scott J. Ferrell

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2017, I electronically filed the foregoing **JOINT MOTION FOR DISMISSAL OF ALL CLAIMS WITHOUT PREJUDICE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)** with the Clerk of the Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Scott J. Ferrell, Esq.

Scott J. Ferrell, Esq.

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