

1 Scott J. Ferrell, Bar No. 202091  
sferrell@pacifictrialattorneys.com  
2 PACIFIC TRIAL ATTORNEYS  
A Professional Corporation  
3 4100 Newport Place Drive, Suite 800  
Newport Beach, CA 92660  
4 Tel: (949) 706-6464  
Fax: (949) 706-6469

5  
6 Attorneys for Plaintiff  
MATTHEW LOPEZ

7 Daniel S. Silverman, Bar No. 137864  
dssilverman@venable.com  
8 Matthew M. Gurvitz, Bar No. 272895  
mmgurvitz@venable.com  
9 VENABLE LLP  
2049 Century Park East, Suite 2300  
10 Los Angeles, CA 90067  
Tel: (310) 229-9900  
11 Fax: (310) 229-9901

12 Attorneys for Defendant  
STAGES OF BEAUTY, LLC  
13

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

16 MATTHEW LOPEZ, individually and on  
17 behalf of all others similarly situated,

18 Plaintiff,

19  
20 v.

21 STAGES OF BEAUTY, LLC, a Delaware  
22 limited liability company; and DOES 1 –  
23 10, inclusive,

24 Defendants.  
25

Case No. 3:17-cv-01888-MMA-KSC

**JOINT MOTION FOR DISMISSAL  
OF ACTION WITH PREJUDICE**

1 TO THE COURT AND ALL PARTIES:

2 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff  
3 Matthew Lopez (“Plaintiff”) and Defendant Stages of Beauty, LLC jointly request that  
4 this Court enter a dismissal with prejudice of Plaintiff’s Complaint in the above-entitled  
5 action. Each party shall bear his/its own costs and attorneys’ fees.

6 IT IS SO STIPULATED.

7  
8 Respectfully submitted,

9 Dated: March 26, 2018

PACIFIC TRIAL ATTORNEYS

10  
11 By: /s/Victoria C. Knowles  
12 Attorney for Plaintiff

13 VENABLE LLP

14  
15 By: /s/Daniel S. Silverman  
16 Attorney for Defendant

17  
18 *I, Victoria C. Knowles, hereby certify that the content of this document is*  
19 *acceptable to all persons required to sign this document and that I obtained the*  
20 *authorizations necessary for the electronic signatures of all parties for this document.*

21 /s/ Victoria C. Knowles  
22 Victoria C. Knowles

**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2018, I electronically filed the foregoing **JOINT MOTION FOR DISMISSAL OF ACTION WITH PREJUDICE** 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/ Victoria C. Knowles*  
Victoria C. Knowles

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