

1 KOLIN C. TANG (SBN 279834)
Email: ktang@sfmsslw.com
2 SHEPHERD, FINKELMAN, MILLER
& SHAH, LLP
3 11755 Wilshire Blvd, 15th Floor
Los Angeles, CA 90025
4 Telephone: (323)510-4060
Facsimile: (866)300-7367

5 *Counsel for Plaintiff, on behalf of himself*
6 *And all others similarly situated*

7
8 **IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9 DANIEL BERMAN, on behalf of
10 himself and all other similarly situated,

11 Plaintiff,

12 v.
13

14 BATTEN INDUSTRIES, INC.,
15 BATTEN INDUSTRIES (US) INC.,
and BATTEN SERVICES (US) INC.,

16 Defendant.
17

Case No. 2:18-cv-02818-SVW (FFMx)

**STIPULATION OF DISMISSAL
PURSUANT TO F.R.C.P. 41**

Courtroom: 10A
Judge: Stephen V. Wilson

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19 Plaintiff, Daniel Berman, and Defendants, Batten Industries Inc., Batten
20 Industries (US) Inc., and Batten Services (US) Inc., through their respective
21 counsel of record, hereby stipulate and agree that, in accordance with Federal
22 Rule of Civil Procedure 41(a)(1)(ii), this action shall be dismissed with
23 prejudice, with each party to pay his or their own costs and attorneys' fees.
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Dated: January 2, 2019

SHEPHERD, FINKELMAN, MILLER
& SHAH, LLP

By: /s/ Kolin C. Tang
Kolin C. Tang (SBN 279834)

Attorneys for Plaintiff
DANIEL BERMAN, on behalf of himself
and all others similarly situated

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the
filer attests that all other signatories listed
below, and on whose behalf this filing is
submitted, concur in the filing's content
and have authorized the filing.

Dated: January 2, 2019

PERKINS COIE LLP

By: /s/ Steven K. Hwang
Steven K. Hwang (SBN 216852)
SKHwang@perkinscoie.com

Attorneys for Defendants
BATTEN INDUSTRIES, INC., BATTEN
INDUSTRIES (US) INC., and BATTEN
SERVICES (US) INC.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

DANIEL BERMAN, on behalf of
himself and all other similarly situated,

Plaintiff,

v.

BATTEN INDUSTRIES, INC.,
BATTEN INDUSTRIES (US) INC.,
and BATTEN SERVICES (US) INC.,

Defendant.

Case No. 2:18-cv-02818-SVW (FFMx)

[PROPOSED] ORDER

[Filed concurrently with Stipulation of
Dismissal Pursuant to F.R.C.P. 41]

Pursuant to the stipulation of dismissal filed by Plaintiff, Daniel Berman,
and Defendants, Batten Industries Inc., Batten Industries (US) Inc., and Batten
Services (US) Inc.,

IT IS HEREBY ORDERED that:

This action is dismissed with prejudice, with each party to pay his or their
own costs and attorneys' fees.

IT IS SO ORDERED

Dated: _____, 2019

By: _____

United States District Judge

[PROPOSED] ORDER
Case No. 2:18-cv-02818-SVW (FFMx)