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7 Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 ROMAN SCANLON, on behalf of himself, the  
11 general public, and those similarly situated,

12 Plaintiff,

13 v.

14 CURTIS INTERNATIONAL, LTD.,

15 Defendant.

CASE NO. 1:19-cv-00937-NONE-SKO  
STIPULATION AND [PROPOSED] ORDER  
OF DISMISSAL

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**STIPULATION**

The parties, Plaintiff ROMAN SCANLON (“Plaintiff”) and Defendant CURTIS INTERNATONAL, LTD (“Curtis” or “Defendant”), submit this Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Plaintiff and Curtis (collectively the “Parties”) stipulate that all of Plaintiff’s individual claims brought in this litigation are fully resolved and hereby dismissed with prejudice. The Parties further stipulate that all putative class member claims are dismissed without prejudice. Each party shall bear its own attorneys’ fees and costs.

Dated: February 24, 2021

**MAYER BROWN LLP**

By: /s/John Nadolenco/s/\_\_\_\_\_  
John Nadolenco, Esq.  
Attorneys for Defendant CURTIS  
INTERNATIONAL, LTD.

Dated: February 24, 2021

**GUTRIDE SAFIER LLP**

/s/Seth Safier/s/  
By: \_\_\_\_\_  
Seth A. Safier  
  
Attorneys for Plaintiff  
ROMAN SCANLON

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**PROPOSED ORDER**

Pursuant to the stipulation of the parties under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action is and remains DISMISSED WITH PREJUDICE as to all Plaintiff's claims, causes of action, and parties and WITHOUT PREJUDICE as to all putative class member claims, with each party bearing their own attorneys' fees and costs. The Clerk is directed to close the file.

DATED: \_\_\_\_\_  
Hon. Sheila K. Oberto

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