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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 PHILLIP RACIES, On Behalf of Himself
and All Others Similarly Situated,

15 Plaintiff,

16 vs.

17 QUINCY BIOSCIENCE, LLC, a
Wisconsin limited liability company,

19 Defendant.

) Case No. 4:15-cv-00292-HSG

) **STIPULATION REGARDING**
) **VOLUNTARY DISMISSAL OF**
) **PLAINTIFF'S INDIVIDUAL CLAIMS**
) **WITHOUT PREJUDICE**

) Judge: Hon. Haywood S. Gilliam, Jr.

) Complaint Filed: January 21, 2015
) Am. Complaint Filed: February 20, 2015
) Trial Date: January 6, 2020

1 Plaintiff, Phillip Racies, and Defendant, Quincy Bioscience, LLC, by and through their
2 undersigned counsel and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
3 Procedure, hereby stipulate to Plaintiff's dismissal of his individual claims without prejudice.
4

5 Dated: May 28, 2020

Respectfully Submitted,

6 BONNETT, FAIRBOURN, FRIEDMAN
7 & BALINT, P.C.

8 By: /s/ Patricia N. Syverson
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15 *Attorneys for Plaintiff Phillip Racies*

16 Dated: May 28, 2020

Respectfully submitted,

17 CALL & JENSEN
18 A Professional Corporation
Matthew R. Orr
19 William P. Cole
Joshua G. Simon

20 By: /s/ Matthew R. Orr
Matthew R. Orr

21 and

22 Geoffrey W. Castello [*Admitted Pro Hac Vice*]
23 Glenn T. Graham [*Admitted Pro Hac Vice*]
24 Kelley Drye & Warren LLP

25 Attorneys for Defendant Quincy Bioscience, LLC
26
27
28

SIGNATURE CERTIFICATION

Pursuant to Rule 5-1(i)(3) of the United States District Court for the Northern District of California Local Rules, I hereby certify that the content of this document is acceptable to Matthew R. Orr, counsel for Defendant, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: May 28, 2020

BONNETT, FAIRBOURN, FRIEDMAN &
BALINT, P.C.

By: /s/ Patricia N. Syverson
Patricia N. Syverson
Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2020, I electronically filed the foregoing document described as **STIPULATION AND [PROPOSED] ORDER REGARDING VOLUNTARY DISMISSAL OF PLAINTIFF’S INDIVIDUAL CLAIMS WITHOUT 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/ Patricia N. Syverson
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