

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

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14 Attorneys for Plaintiff  
Andre Ward

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18

19 ANDRE WARD,

20 Plaintiff,

21 vs.

22 DAN GOOSSEN and GOOSSEN TUTOR  
PROMOTIONS, LLC,

23 Defendants.  
24  
25  
26

No.: 3:14-cv-03510-TEH

**JOINT STIPULATION PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)(A)(ii)  
DISMISSING ACTION WITH  
PREJUDICE**

Hearing Date: No Date Set  
Hearing Time: No Time Set  
Place: Courtroom 12

Hon. Thelton E. Henderson

1 Plaintiff, Andre Ward, defendant Goossen-Tutor Promotions, LLC, and  
2 defendant Debbie Goossen as executor of the estate of Dan Goossen, by and through  
3 their respective counsel, hereby stipulate and agree as follows:  
4

5 Whereas the Complaint in this action was filed on August 4, 2014 and the  
6 defendants filed an Answer to the Complaint on October 29, 2014,  
7

8 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby  
9 stipulate and agree to dismiss this action with prejudice with all parties bearing their  
10 own respective attorneys' fees and costs.  
11

12 DATED: December 31, 2014

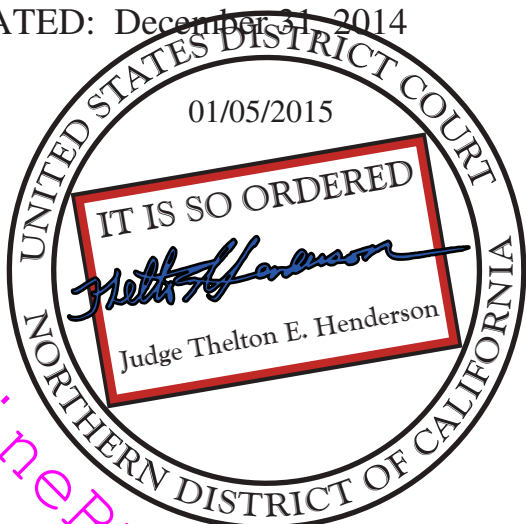
13 REED SMITH LLP

14 By: /s/ James L. Sanders  
15 James L. Sanders (SBN 126291)<sup>1</sup>  
16 Attorneys for Plaintiff Andre Ward  
17

18 DATED: December 31, 2014

19 GREENBERG GLUSKER FIELDS  
20 CLAMAN & MACHTINGER LLP

21 By: /s/ Charles N. Shephard  
22 Charles N. Shephard (SBN 078129)  
23 Attorneys for Defendants Goossen- Tutor  
24 Promotions, LLC and Debbie Goossen as  
25 executor of the estate of Dan Goossen  
26



27 <sup>1</sup> Pursuant to Local Rule 5-1(i)(3), filing counsel attests that all other signatories listed,  
28 on whose behalf the filing is submitted, concur in the filing's content and have  
authorized the filing

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