

McNAMARA, NEY, BEATTY, SLATTERY, BORGES & AMBACHER LLP
ATTORNEYS AT LAW
1211 NEWELL AVENUE, WALNUT CREEK, CA 94596
TELEPHONE: (925) 939-5330

NOAH G. BLECHMAN (State Bar No. 197167)
noah.blechman@mcnamaralaw.com
McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP
1211 Newell Avenue
Walnut Creek, CA 94596
Telephone: (925) 939-5330
Facsimile: (925) 939-0203

Attorneys for Defendants Mike Hansen, Chris Loercher,
Francisco Ramirez, Steven White, Eduardo Montero and
Matthew Switzer

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN BURNS, TAMMY BURNS,
BOBBY LAWRENCE, ESTATE OF
CHARLES BURNS by TAMMY BURNS,
Successor in Interest of the Estate of
Charles Burns,

Plaintiffs,

vs.

CITY OF CONCORD, et al.,

Defendants.

Case No. C14-00535 LB

**STIPULATION AND [PROPOSED]
ORDER DISMISSING ENTIRE ACTION
AS TO JOHN BURNS, TAMMY BURNS
AND THE ESTATE OF CHARLES BURNS
BY TAMMY BURNS, SUCCESSOR IN
INTEREST, WITH PREJUDICE**

Judge: Hon. Laurel Beeler
Dept: USDC (SF), 15th Floor

All remaining Defendants and Plaintiffs, John Burns, Tammy Burns Individually and as the Successor in Interest for The Estate of Charles Burns, by and through their respective attorneys of record, hereby stipulate and jointly request an Order from the Court to a dismissal of all remaining claims by said Plaintiffs' in the Fourth Amended Complaint (ECF 109, operative complaint), namely the entire action as to those named Plaintiffs, against the remaining Defendants in this action, with prejudice. Each party agrees to bear its own fees and costs as to this dismissal.

McNAMARA, NEY, BEATTY, SLATTERY, BORGES & AMBACHER LLP
ATTORNEYS AT LAW
1211 NEWELL AVENUE, WALNUT CREEK, CA 94596
TELEPHONE: (925) 939-5330

The parties attest that concurrence in the filing of these documents has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

Dated: March 12, 2018

JOHNSON&JOHNSON

By: /s/ Johnson, Peter
Peter Johnson
Attorneys for Plaintiffs

Dated: March 12, 2018

McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP

By: /s/ Blechman, Noah G.
Noah G. Blechman
Attorneys for Defendants Mike Hansen, Chris
Loercher, Francisco Ramirez, Steven White, Eduardo
Montero and Matthew Switzer

ORDER

PURSUANT TO STIPULATION AND REQUEST, IT IS ORDERED AS FOLLOWS:

The Court hereby dismisses all claims by John Burns, Tammy Burns and Tammy Burns as Successor in Interest for the Estate of Charles Burns, with prejudice, as to all claims alleged by said Plaintiffs against the remaining Defendants. Each party to bear its own fees and costs as to this dismissal.

IT IS SO ORDERED

Dated: _____

By: _____
Hon. Laurel Beeler
Magistrate Judge of the District Court