

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

NEW ORLEANS DIVISION

JULIO NAVARRETE-CRUZ,)
SERGIO DE LEON, and)
ADRIAN SALAZAR,)

on behalf of themselves and all) Case No. 06-0489
others similarly situated,) SECT K MAG 4

Plaintiffs,)

v.)

LVI ENVIRONMENTAL SERVICES)
OF NEW ORLEANS, INC.,)
D&L ENVIRONMENTAL INC., and AMS)
STAFF LEASING, INC.,)

Defendants.)

STIPULATION AND PROPOSED ORDER OF DISMISSAL WITH PREJUDICE

IT IS HEREBY stipulated and agreed between Plaintiffs JULIO NAVARRETE-CRUZ, SERGIO DE LEON, AND ADRIAN SALAZAR (collectively “Plaintiffs”) and Defendants LVI ENVIRONMENTAL SERVICES OF NEW ORLEANS, INC., D&L ENVIRONMENTAL INC., and AMS STAFF LEASING, INC. (collectively “Defendants”) as follows:

Representative and Opt-in Plaintiffs voluntarily dismiss the Complaint and all claims against Defendants with prejudice, pursuant to the Confidential Settlement Agreement and General Release (“the Agreement”) entered into between the parties. The parties represent that this Agreement reflects a reasonable compromise of a bona fide dispute over FLSA provisions, and was negotiated at “arms length” and with the advice of counsel.

A proposed order is attached for the convenience of the Court.

/s/ Jennifer Rosenbaum

Jennifer Rosenbaum, Esq.
Attorney for Plaintiffs
Immigrant Justice Project
Southern Poverty Law Center
400 Washington Avenue
Montgomery, Alabama 36104
Phone: 334.956.8200
Fax: 334.956.8481

Dated: 5/2/07

/s/ Barry Gerharz

Barry Gerharz
Attorneys for Plaintiffs
Juvenile Justice Project of La.
1600 Oretha Castle Haley Blvd.
New Orleans, LA 70113
Telephone: (504) 522-5437
Facsimile: (504) 522-5430

Dated: 5/2/07

/s/ David M. Korn

David M. Korn, Esq.
Attorneys for D&L Environmental Inc. of New Orleans
Phelps Dunbar, LLP
365 Canal Street
Suite 2000
New Orleans, LA 70130-6534

Dated: 5/2/07

/s/ Steve Dennis

Steve Dennis, Esq.
William E. Reid, Esq.
Attorneys for AMS Staff Leasing, Inc.
Reid & Dennis, PC
Providence Tower , Suite 255W
5001 Spring Valley Road
Dallas, TX 75244
Metairie, LA 70009

Dated: 5/2/07

/s/ Anne Marie Estevez

Anne Marie Estevez
MORGAN, LEWIS & BOCKIUS LLP
5300 Wachovia Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131-2339
Telephone: 305.415.3330
Facsimile: 877.432.9652 (toll free)

Dated: 5/2/07

-and-

/s/ Robert K. McCalla

Robert K. McCalla
Fisher & Phillips LLP
201 St. Charles Avenue, Suite 3710
New Orleans, Louisiana 70170
Telephone: 504.522.3303
Facsimile: 504.529.3850

Dated: 5/2/07

Attorneys for Defendant
LVI Environmental Services of New Orleans,
Inc.