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15 Attorneys for Defendants,
CITY OF OAKLAND, et al.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19 KAYVAN SABEGHI,
20 Plaintiff,
21 v.
22 OAKLAND POLICE OFFICER FRANK
23 UU, ET AL.,
24 Defendants.

No. C12-06057-JSC (LB)

**STIPULATION FOR ENTRY OF
FINAL ORDER OF DISMISSAL**

25 Whereas, Plaintiff filed a civil rights lawsuit on November 29, 2012, against the
26 City of Oakland and individual Oakland Police Defendants seeking monetary damages
27 arising from police actions on November 2-3, 2011;
28

1 Whereas, the parties participated in two settlement conferences before Magistrate
2 Judge Laurel Beeler;

3 WHEREAS, the parties have taken into account the uncertainty, risks, time and
4 expense inherent in litigation, and thus have agreed to resolve this matter upon the terms,
5 and subject to the conditions set forth in this Stipulation;

6 WHEREAS, the undersigned counsel have authority on behalf of their respective
7 clients to enter into this Stipulation and to fully resolve this matter on the terms herein;

8 WHEREAS, in consideration of the Release signed by Plaintiff, Defendant City of
9 Oakland has paid the amount of \$645,000 to Plaintiff and his attorneys in complete
10 settlement of Plaintiff's claims including attorney's fees and costs;

11 THEREFORE, the parties respectfully request that the Court enter the attached
12 Final Order of Dismissal; and that the Case Management Conference, currently scheduled
13 for February 6, 2014, be vacated.

14 Dated: January 30, 2014 /s/

15 Rachel Lederman
16 Attorney for Plaintiff

17 /s/

18 James Hodgkins
19 Attorney for Defendants

20
21
22 **SIGNATURE ATTESTATION**

23 I am the ECF User whose ID and Password are being used to file
24 this stipulated request. In compliance with General Order 45, X.B., I hereby attest that
25 Mr. Hodgkins has concurred in this filing.

26 Dated: January 30, 2014 /S/
27 Rachel Lederman

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KAYVAN SABEGHI,
Plaintiff,
v.
OAKLAND POLICE OFFICER FRANK
UU, ET AL.,
Defendants.

No. C12-06057-JSC

**[PROPOSED]
FINAL ORDER OF DISMISSAL**

All parties have stipulated to settlement in the above entitled case. The Stipulation for Entry of Final Order of Dismissal dated January 30, 2014, has been filed with this Court. Accordingly, pursuant to the stipulation of the parties, and good cause appearing, the action is DISMISSED.

Dated:

UNITED STATES MAGISTRATE JUDGE