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8 Attorneys for Defendants
9 Richard Shorkey, Catherine Shorkey,
Stratton & Kerch, and Joel DeYoung

10 (Additional parties and counsel listed on next page)

11
12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 _____)
XIONG XENG MOUA et al.)

15 Plaintiffs,)

16 vs.)

17 CITY OF CHICO et al.)

18 Defendants.)

19 _____)
XIONG XENG MOUA et al.)

20 Plaintiffs,)

21 JOEL DE YOUNG)

22 Defendants.)
23 _____)

Case Nos. CIVS 02-0923-DFL KJM
CIVS 03-1300-DFL KJM

STIPULATION OF DISMISSAL;
[PROPOSED] ORDER

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1 Additional Counsel:

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13 Attorney for Plaintiffs

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15 MILLER, STARR & REGALIA
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17 Palo Alto, California 94301
18 Telephone: (650) 463-7800
19 Facsimile: (650) 462-1010

20 Attorneys for Defendants
21 Richard Shorkey, Catherine Shorkey
22 and Joel DeYoung
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1 Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, the parties
2 by their respective counsel of record or on their own behalf pro se, hereby stipulate that
3 the above-entitled action is dismissed with prejudice, except that the court will retain
4 jurisdiction to enforce the terms of the confidential settlement agreement for 120 days
5 from the date of the dismissal.

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Post Office Box 1299
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April
Date: ~~March~~ 15, 2005

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16

By _____ /s/
Ilene J. Jacobs
Attorneys for Plaintiffs

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2015 Shasta Street/PO Box 992710
Redding CA 96099-2710

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21

Date: March 31, 2005.

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By _____ /s/
Craig Sinclair
Attorneys for Defendants
Richard Shorkey and Catherine Shorkey
Stratton & Kerch and Joel DeYoung

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MILLER, STARR & REGALIA
300 Hamilton Avenue, Third Floor
Palo Alto, California 94301

Date: March 28, 2005.

By _____ /s/ _____
Lewis J. Soffer
Attorneys for Defendants
Richard Shorkey and Catherine Shorkey
and Joel DeYoung

CHAD KEICHLER

Date: March ____, 2005.

By _____ /s/ _____
Defendant Pro Se

ORDER

Pursuant to stipulation, it is hereby ordered that the above-entitled action is dismissed with prejudice, except that the court will retain jurisdiction for a period of 120 days to enforce the terms of the confidential settlement agreement.

Pursuant to stipulation, it is so ordered.

Dated: 4/19/2005.

/s/ David F. Levi
David F. Levi
United States District Judge

1 *Xiong Xeng Moua, et al. v. City of Chico, et al.*
2 USDC Eastern District of California, Case No. CIVS 02-0923 DFL JFM;

3 **PROOF OF SERVICE**

4 I am employed in the county of Yuba. I am over the age of eighteen years and am not
5 a party to the within above entitled action; my business address is 511 D Street, Marysville,
6 California.

7 On this date, I served a true copy of the foregoing document described as:

8 **STIPULATION OF DISMISSAL [PROPOSED] ORDER**

9 on the parties identified below in said action by causing a true copy thereof to be placed in
10 a sealed envelope, with postage paid and addressed to the following persons:

11
12 Craig A. Sinclair, Esq.
13 NISSON, PINCIN, SINCLAIR, HILL &
14 PERRINE
2015 Shasta Street/PO Box 992710
Redding CA 96099-2710

Mr. Chad Keichler
1569 Marauder Lane
Chico, CA 95973

15
16 Lewis J. Soffer, Esq.
17 MILLER, STARR & REGALIA
300 Hamilton Avenue, Third Floor
18 Palo Alto, California 94301

19
20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct.

22 Executed on **April 15, 2005**, in Marysville, California 95901

23
24
25 _____
26 Bonnye Hughes
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