Larry Chae (SBN 268979)
lchae@slpattorney.com
SLPCaseDocs+3C6UR5SL9NG252934Gaines@slpattorney.com
STRATEGIC LEGAL PRACTICES, APC
1888 Century Park East, 19th Floor
Los Angeles, CA 90067
Tel: (310) 929-4900 | Fax: (310) 943-3838

Attorneys for Plaintiffs,
BILL GAINES and WANDA GAINES

Steven D. Park (SBN 215219)
spark@parklawless.com
John R. Lawless (SBN 223561)
jlawless@parklawless.com
Vincent Tremonti (SBN 301571)
vtremonti@parklawless.com
Charles C. Cavanagh (SBN 198468)
ccavanagh@parklawless.com
PARK LAWLESS & TREMONTI LLP
177 E. Colorado Blvd., Suite 200
Pasadena, CA 91105
Telephone: (213) 640-3770
Facsimile: (213) 640-3015

Attorneys for Defendant
FCA US, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

BILL GAINES and WANDA GAINES,

Plaintiffs,

v.

FCA US, LLC,

Defendant.

Case No: 2:24-cv-03522-JAM-CKD

Judge: Hon. John A. Mendez
Mag. Judge: Hon. Carolyn K. Delaney

STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE WITH THE COURT RETAINING JURISDICTION FOR 90 DAYS

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs BILL GAINES and WANDA GAINES, and Defendant FCA US, LLC (collectively, the "Parties"), by and through their respective undersigned counsel of record, hereby stipulate and agree as follows:

WHEREAS, the Parties have reached a settlement of all claims, counterclaims, and causes of action asserted or that could have been asserted in this action, the terms of which are set forth in a separate written settlement agreement between the Parties;

NOW, THEREFORE, the Parties stipulate and agree, and respectfully request that the Court enter the attached [Proposed] Order providing as follows:

1. This entire action, including all claims and causes of action asserted therein, is hereby **dismissed with prejudice** pursuant to Federal Rule of Civil Procedure 41(a)(2).
2. Each Party shall bear its own costs and attorneys' fees, except as otherwise provided in the Parties' settlement agreement.
3. The Court shall **retain jurisdiction** over this action for a period of **ninety (90) days** following entry of the Order of dismissal, solely for the limited purpose of enforcing the terms and conditions of the Parties' settlement agreement, should any dispute arise regarding performance thereunder. *See Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375, 381 (1994); *In re City Equities Anaheim, Ltd.*, 22 F.3d 954, 957 (9th Cir. 1994).
4. In the event the settlement is fully performed within the ninety (90) day retention period, this Court's jurisdiction shall terminate automatically without further order of the Court.

Dated: August 25, 2026

STRATEGIC LEGAL PRACTICES, APC

By: */s/ Larry Chae*
Larry Chae
Attorneys for Plaintiffs

BILL GAINES and WANDA GAINES

Dated: August 25, 2026

PARK LAWLESS & TREMONTI LLP

By: /s/ *Vincent Tremonti*
Steven D. Park
John R. Lawless
Vincent Tremonti
Charles C. Cavanagh
Attorneys for Defendant
FCA US, LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule, I hereby attest that the other signatory to this document has concurred in the filing of this document and that I have obtained authorization to affix his electronic signature to this document.

Dated: August 25, 2026

STRATEGIC LEGAL PRACTICES, APC

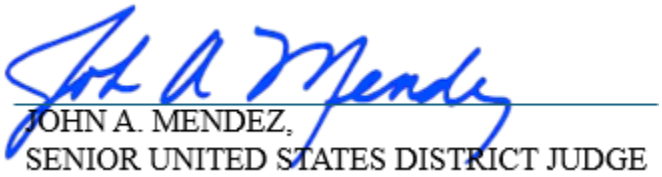
By: */s/ Larry Chae*
Larry Chae
Attorneys for Plaintiffs
BILL GAINES and WANDA GAINES

BILL GAINES and WANDA GAINES, Plaintiffs, v. FCA US, LLC, Defendant.	Case No: 2:24-cv-03522-JAM-CKD Judge: Hon. John A. Mendez Mag. Judge: Hon. Carolyn K. Delaney **ORDER OF DISMISSAL WITH PREJUDICE**

Based on the stipulation of the parties and good cause appearing, **IT IS HEREBY ORDERED THAT:**

1. This entire action, including all claims and causes of action asserted therein, is hereby **DISMISSED WITH PREJUDICE** pursuant to Federal Rule of Civil Procedure 41(a)(2);
2. Each Party shall bear its own costs and attorneys' fees, except as otherwise provided in the Parties' settlement agreement;
3. The Court shall **retain jurisdiction** over this action for a period of **ninety (90) days** following entry of this Order, solely for the limited purpose of enforcing the terms and conditions of the Parties' settlement agreement, should any dispute arise regarding performance thereunder;
4. In the event the settlement is fully performed within the ninety (90) day retention period, this Court's jurisdiction shall terminate automatically without further order of the Court.

IT IS SO ORDERED.



JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE

Dated: August 27, 2026