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Attorneys for Defendants

AHMED KHALFAN, JONATHAN PLATZNER,

KRISTIAN PALMA and CITY OF RICHMOND

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JOHNATHAN SPRAGAN,

Plaintiff,

v.

AHMED KHALFAN; JONATHAN
PLATZNER; KRISTIAN PALMA; CITY OF
RICHMOND, CALIFORNIA; and Does 1-50,

Defendants.

Case No. 20-cv-03807-CRB

[Related to Case Nos. 20-cv-03712-CRB;
20-cv-04035-CRB; and 20-cv-04400-CRB]

**STIPULATION AND ~~PROPOSED~~
ORDER TO DISMISS RELATED CASES
WITH PREJUDICE**

IT IS HEREBY STIPULATED by and between Plaintiffs DEJON BROWN, JOHNATHAN SPRAGAN and DARERON BROWN ("Plaintiffs"), on the one hand, and Defendants CITY OF RICHMOND, AHMED KHALFAN, BRANDON HODGES, JESSE SOUSA, KRISTIAN PALMA and JONATHAN PLATZNER ("Defendants"), on the other hand, through their attorneys of record, as follows:

WHEREAS, Plaintiffs Dejon Brown, Johnathan Spragan and Dareron Brown have each filed a separate lawsuit, captioned as follows: *Dejon Brown v. Ahmed Khalfan, Brandon Hodges, Jesse Sousa, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-3712-CRB; *Johnathan Spragan v. Ahmed Khalfan, Jonathan Platzner, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-3807-CRB; and *Dareron Brown v. Ahmed Khalfan, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-4035-CRB ("Related Cases");

WHEREAS, in response to Plaintiffs' respective Administrative Motions, the Court deemed the Related Cases related pursuant to Civil Local Rule 3-12; and

WHEREAS, Plaintiffs and Defendants have reached a settlement in the Related Cases.

THEREFORE, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants hereby stipulate that the Related Cases be dismissed, with prejudice. Each party to bear their own costs and fees. This dismissal does not constitute an adjudication on the merits.

Dated: May 19, 2021

ORBACH HUFF SUAREZ + HENDERSON LLP

By: /s/ Kevin E. Gilbert

Kevin E. Gilbert

Attorney for Defendants AHMED KHALFAN,

BRANDON HODGES, JESSE SOUSA, KRISTIAN

PALMA, JONATHAN PLATZNER and CITY OF RICHMOND

Dated: May 19, 2021

LAWYERS IN LAFAYETTE

By: /s/ Daniel Horowitz

Daniel Horowitz

Thomas J. Kensok

Attorneys for Plaintiffs DEJON BROWN, JOHNATHAN

SPRAGAN and DARERON BROWN

~~[PROPOSED]~~ ORDER

Having reviewed the parties' Stipulation and GOOD CAUSE appearing therefore, the Court orders as follows:

1. The following related cases are hereby dismissed, with prejudice:
 - *Dejon Brown v. Ahmed Khalfan, Brandon Hodges, Jesse Sousa, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-3712-CRB;
 - *Johnathan Spragan v. Ahmed Khalfan, Jonathan Platzner, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-3807-CRB; and
 - *Dareron Brown v. Ahmed Khalfan, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-4035-CRB.

IT IS SO ORDERED.

Dated: May 20, 2021



Honorable Charles R. Breyer
United States Magistrate Judge