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13 AHMED KHALFAN, JONATHAN PLATZNER,

14 KRISTIAN PALMA and CITY OF RICHMOND

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 JOHNATHAN SPRAGAN,

19 Plaintiff,

20 v.

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

24 Defendants.

25 Case No. 20-cv-03807-CRB

26 [Related to Case Nos. 20-cv-03712-CRB;
27 20-cv-04035-CRB; and 20-cv-04400-CRB]

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

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

6 WHEREAS, Plaintiffs Dejon Brown, Johnathan Spragan and Dareron Brown have each
7 filed a separate lawsuit, captioned as follows: *Dejon Brown v. Ahmed Khalfan, Brandon*
8 *Hodges, Jesse Sousa, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-
9 cv-3712-CRB; *Johnathan Spragan v. Ahmed Khalfan, Jonathan Platzner, Kristian Palma and*
10 *City of Richmond*, U.S. District Court Action No. 20-cv-3807-CRB; and *Darereron Brown v.*
11 *Ahmed Khalfan, Kristian Palma and City of Richmond*, U.S. District Court Action No. 20-cv-
12 4035-CRB (“Related Cases”);

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

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

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

20 Dated: May 19, 2021

ORBACH HUFF SUAREZ + HENDERSON LLP

21 By: /s/ Kevin E. Gilbert
22 Kevin E. Gilbert
23 Attorney for Defendants AHMED KHALFAN,
24 BRANDON HODGES, JESSE SOUSA, KRISTIAN
25 PALMA, JONATHAN PLATZNER and CITY OF RICHMOND

26 Dated: May 19, 2021

LAWYERS IN LAFAYETTE

27 By: /s/ Daniel Horowitz
28 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
- *Darerion 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