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ATTORNEYS FOR: Defendant Stephens Institute d/b/a Academy of Art University

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA, ex rel. SCOTT ROSE, MARY AQUINO, MITCHELL NELSON AND LUCY STEARNS,

Plaintiffs/Relators,

v.

STEPHENS INSTITUTE, a California corporation, doing business as ACADEMY OF ART UNIVERSITY, and DOES 1 through 50, inclusive,

Defendants.

Case No. 4:09-cv-05966-PJH

STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO SETTLEMENT AGREEMENT AND FRCP 41 AND ORDER

Judge: Hon. Phyllis Hamilton
Location: Courtroom 3, 3rd Floor

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

TO THE COURT AND ALL PARTIES OF RECORD:

The parties have entered into a settlement agreement resolving all claims in this action. Pursuant to Federal Rule of Civil Procedure 41(a)(1), and in accordance with and subject to the terms of the settlement agreement, the parties stipulate that this action be dismissed with prejudice. The Parties intend this dismissal to constitute a full and final judgment in this action.

The Parties have been informed that counsel for the United States of America will be filing a consent to this dismissal.

The parties further stipulate that this Court should retain jurisdiction exclusively to enforce the settlement agreement.

IT IS SO STIPULATED.

Dated: November 5, 2021

THE JAFFE LAW FIRM

/s/ Stephen Jaffe
By: Stephen Jaffe

Dated: November 5, 2021

WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK LLP

/s/ James Wagstaffe
By: James Wagstaffe

Attorneys for Plaintiffs/Relators Scott Rose, Mary Aquino, Mitchell Nelson, and Lucy Stearns

Dated: November 5, 2021

GOMBOS LEYTON, P.C.

/s/ Steven M. Gombos
By: Steven M. Gombos (admitted pro hac vice)

Attorneys for Defendant Stephens Institute d/b/a Academy of Art University

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: November 5, 2021

WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK LLP

/s/ James Wagstaffe
By: James Wagstaffe

Attorneys for Plaintiffs/Relators Scott Rose, Mary Aquino, Mitchell Nelson, and Lucy Stearns

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
IT IS SO ORDERED
Judge Phyllis J. Hamilton
November 8, 2021

W | V | B | R