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18 RODRIGUEZ, VU TRUONG TRAN, and
19 BENJAMIN ADHAM PECHETTI

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA

22 WORLD WRESTLING)
23 ENTERTAINMENT, INC.,) Case Number: C 15-01263-VC
24)
25 Plaintiff,) STIPULATION OF DISMISSAL AND
26) [PROPOSED] ORDER
27)
28 vs.)
29)
30 DOMINIC ANGEL RODRIGUEZ, VU)
31 TRUONG TRAN, BENJAMIN ADHAM)
32 PECHETTI, IBRAHAM NIMER)
33 SHIHEIBER, JOHN AND JANE DOES 1-)
34 100, and XYZ CORPORATIONS 1-100,)
35)
36 Defendants.)
37)
38)

39 WHEREAS, Plaintiff WORLD WRESTLING ENTERTAINMENT, INC. filed its
40 Amended Verified Complaint for Injunctive Relief and Demand for Jury Trial on April 7, 2015;

1 WHEREAS, Plaintiff and Defendants DOMINIC ANGEL RODRIGUEZ, VU TRUONG
2 TRAN, and BENJAMIN ADHAM PECHETTI settled this matter on or about September 1,
3 2015;

4 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants
5 Dominic Angel Rodriguez, Vu Truong Tran, and Benjamin Adham Pechetti through their
6 designated counsel that the above-captioned action should be dismissed without prejudice as to
7 the above-named defendants only pursuant to FRCP 41(a)(1)(A) and that all other claims in this
8 lawsuit that are not between WWE and DOMINIC ANGEL RODRIGUEZ, VU TRUONG
9 TRAN, and BENJAMIN ADHAM PECHETTI shall be unaffected by this stipulation and shall
10 remain in full force. The parties further stipulate that the parties shall bear their own attorney's
11 fees, expenses and costs.

12 IT IS SO STIPULATED.

13 Dated: September 10, 2015

/s/ Matthew G. Ball

14 Matthew G. Ball
15 Attorney for Plaintiff WORLD WRESTLING
16 ENTERTAINMENT, INC.

17 Dated: September 10, 2015

/s/ Robert F. Kane

18 Robert F. Kane
19 Attorney for Defendants DOMINIC ANGEL
20 RODRIGUEZ, VU TRUONG TRAN, and
21 BENJAMIN ADHAM PECHETTI

22 **SIGNATURE ATTESTATION**

23 I hereby attest pursuant to Civil Local Rule 5.1 that concurrence in the electronic filing of
24 this document has been obtained from the other signatory.

25 Dated: September 10, 2015

/s/ Matthew G. Ball

26 Matthew G. Ball
27
28

[PROPOSED] ORDER OF DISMISSAL

The above STIPULATION OF DISMISSAL is approved. The above-captioned action is dismissed without prejudice as to Defendants Dominic Angel Rodriguez, Vu Truong Tran, and Benjamin Adham Pechetti pursuant to FRCP 41(a)(1)(A).

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE