

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

KEITH DEAN BRADT, TIM NIEBOER,  
PAM WARD, VALERIE JOLLY, JUNE  
STANSBURY, KATHERINE ARCELL,  
CHRISTINE WHALEN, JOSE BRITO,  
BRENDA DAVIS, PAM FAUST,  
CAROLYN FJORD, GABE GARAVANIAN,  
HARRY GARAVANIAN, JOCELYN  
GARDNER, MIKE MALANEY, LEN  
MARAZZO, LISA MCCARTHY,  
DEBORAH PULFER, WILLIAM  
RUBINSOHN, SONDRAS RUSSELL,  
CLYDE STENSRUD, GARY TALEWSKY,  
DIANE ULTICAN, and JEFFREY  
NICKERSON,

Plaintiffs,

v.

T-MOBILE US, INC., DEUTSCHE  
TELEKOM AG, SPRINT CORPORATION,  
and SOFTBANK GROUP CORP.,

Defendants.

Case No. 5:19-cv-7752-BLF

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER OF DISMISSAL  
WITH PREJUDICE**

1 Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiffs Keith Dean Bradt, Tim  
2 Nieboer, Pam Ward, Valerie Jolly, June Stansbury, Katherine Arcell, Christine Whalen, Jose  
3 Brito, Brenda Davis, Pam Faust, Carolyn Fjord, Gabe Garavanian, Harry Garavanian, Jocelyn  
4 Gardner, Mike Malaney, Len Marazzo, Lisa Mccarthy, Deborah Pulfer, William Rubinsohn,  
5 Sondra Russell, Clyde Stensrud, Gary Talewsky, Diane Ultican, and Jeffrey Nickerson  
6 (collectively, "Plaintiffs") and Defendants T-Mobile US, Inc., Deutsche Telekom AG, Sprint  
7 Corporation, and Softbank Group Corp. (collectively, "Defendants") hereby stipulate and agree  
8 that this case be dismissed with prejudice, and respectfully request that the Court endorse and  
9 enter this joint stipulation as an order providing that:

- 10 1. All claims for relief asserted by Plaintiffs against Defendants in this case are hereby  
11 dismissed with prejudice;
- 12 2. Each party to bear its own attorneys' fees, costs, and expenses.

13  
14  
15 **IT IS SO ORDERED.**

16 Dated: March 26, 2020



17 The Honorable Beth Labson Freeman  
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully Submitted,

ALIOTO LAW FIRM

Dated: March 26, 2020

JOSEPH M. ALIOTO  
JAMIE L. MILLER  
THOMAS P. PIER  
ALIOTO LAW FIRM  
One Sansome Street, 35th Floor  
San Francisco, CA 94104  
Telephone: (415) 434-8900  
Facsimile: (415) 434-9200  
Email: [jmalioto@aliotolaw.com](mailto:jmalioto@aliotolaw.com)  
[jmiller@aliotolaw.com](mailto:jmiller@aliotolaw.com)

LAWRENCE G. PAPALE  
LAW OFFICES OF LAWRENCE G. PAPALE  
1308 Main Street, Suite 117  
St. Helena, CA 94574  
Telephone: (707) 963-1704  
Email: [lgpapale@papalelaw.com](mailto:lgpapale@papalelaw.com)

CHRISTOPHER A. NEDEAU  
NEDEAU LAW FIRM  
750 Battery Street, 7th Floor  
San Francisco, CA 94111  
Telephone: (415) 516-4010  
Email: [cnedeau@nedeaulaw.net](mailto:cnedeau@nedeaulaw.net)

JOSEPHINE L. ALIOTO  
ANTHONY L. LABEL  
THE VEEN FIRM, P.C.  
20 Haight Street  
San Francisco, CA 94102  
Telephone: (415) 673-4800  
Email: [j.alioto@veenfirm.com](mailto:j.alioto@veenfirm.com)  
[a.label@veenfirm.com](mailto:a.label@veenfirm.com)

By:           /s/ Joseph M. Alioto            
JOSEPH M. ALIOTO  
Attorneys for Plaintiffs

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: March 26, 2020

GEORGE S. CARY  
JEREMY J. CALSYN  
DAVID I. GELFAND  
CLEARY GOTTlieb STEEN & HAMILTON  
LLP

By: /s/ David I. Gelfand  
DAVID I. GELFAND  
Attorneys for Defendants  
DEUTSCHE TELEKOM AG and  
T-MOBILE US, INC.

Dated: March 26, 2020

DAVID L. MEYER  
BRADLEY S. LUI  
BONNIE LAU  
MORRISON & FOERSTER LLP

By: /s/ Bonnie Lau  
BONNIE LAU  
Attorneys for Defendants  
SOFTBANK GROUP CORP. and  
SPRINT CORP.

Dated: March 26, 2020

STEVEN C. SUNSHINE  
KAREN HOFFMAN LENT  
JULIA K. YORK  
SKADDEN ARPS

By: /s/ Steven C. Sunshine  
STEVEN C. SUNSHINE  
Attorneys for Defendant  
SPRINT CORP.

Dated: March 26, 2020

ROD STONE  
RICHARD G. PARKER  
GIBSON DUNN

By: /s/ Rod Stone  
ROD STONE  
Attorneys for Defendant  
DEUTSCHE TELEKOM AG

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION CLAUSE**

I, Joseph M. Alioto, hereby attest in accordance with Local Rule 5-1(i)(3) that each signatory has concurred in the filing of this document.

Dated: March 26, 2020

By: /s/ Joseph M. Alioto  
JOSEPH M. ALIOTO

Attorneys for Plaintiffs  
KEITH DEAN BRADT, TIM NIEBOER, PAM  
WARD, VALERIE JOLLY, JUNE STANSBURY,  
KATHERINE ARCELL, CHRISTINE WHALEN,  
JOSE BRITO, BRENDA DAVIS, PAM FAUST,  
CAROLYN FJORD, GABE GARAVANIAN,  
HARRY GARAVANIAN, JOCELYN GARDNER,  
MIKE MALANEY, LEN MARAZZO, LISA  
MCCARTHY, DEBORAH PULFER, WILLIAM  
RUBINSOHN, SONDRRA RUSSELL, CLYDE  
STENSRUD, GARY TALEWSKY, DIANE  
ULTICAN and JEFFREY NICKERSON