

1 **BORISON LAW**  
2 Craig Borison  
3 468 North Camden Drive, Ste 200-90416  
4 Beverly Hills, CA 90210  
5 Telephone: (818) 256-5449  
6 craig@borisonlaw.com

7 Attorneys for Plaintiff NIC DAHLQUIST  
8  
9 [Counsel for Defendant on Signature Page]

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 Nic Dahlquist, individually and on  
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 Samsung Electronics America, Inc.,

17 Defendant.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CASE NO. 5:22-cv-00402-JWH-SP

**JOINT STIPULATED DISMISSAL**

[Submitted concurrently with [Proposed] Order]

Assigned to Hon. John W. Holcomb  
Action filed March 4, 2022

1 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff  
2 Nic Dahlquist (“Plaintiff”) and Defendant Samsung Electronics America, Inc. (“SEA”)   
3 hereby stipulate and agree that: all individual claims that Plaintiff asserted or could have  
4 asserted on his own behalf in the litigation are hereby dismissed *with* prejudice. Plaintiff  
5 and Samsung have resolved all issues concerning attorney’s fees and costs.

6 This dismissal does not affect the rights of any putative class member. The notice  
7 and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable  
8 because this action has not been certified as a class, and a class is not proposed to be  
9 certified for purposes of settlement.

10 Respectfully submitted,

11 Dated: August 26, 2022

**GREENBERG TRAURIG, LLP**

12 By: s/ Michael E. McCarthy  
13 Michael E. McCarthy  
14 *MccarthyMe@gtlaw.com*  
15 1840 Century Park East, Suite 1900  
16 Los Angeles, CA 90067-2121  
17 Telephone: 310-586-7700  
18 Facsimile: 310-586-7800  
19 *Attorneys for Defendant*  
20 *Samsung Electronics America, Inc.*

19 Dated: August 26, 2022

**BORISON LAW**

20 By: s/ Craig Borison  
21 Craig Borison  
22 *Attorneys for Plaintiff*  
23 *Nic Dahlquist*

24 I, Craig Borison, am the CM/ECF user whose ID and password are being used to  
25 file this JOINT STIPULATED DISMISSAL, and I hereby attest that counsel on whose  
26 behalf this filing is jointly submitted have concurred in this filing’s content and have  
27 authorized the filing.

27 Dated: August 26, 2022

28 By: s/ Craig Borison  
Craig Borison

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  
CENTRAL DISTRICT OF CALIFORNIA**

Nic Dahlquist, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

Samsung Electronics America, Inc.,

Defendant.

CASE NO. 5:22-cv-00402-JWH-SP

**[PROPOSED] ORDER GRANTING JOINT  
STIPULATED DISMISSAL**

[Submitted concurrently with Joint Stipulated  
Dismissal]

Assigned to Hon. John W. Holcomb  
Action filed March 4, 2022

1           Having considered the parties' Joint Stipulated Dismissal of this action with prejudice  
2 as to the individual claims of Plaintiff Nic Dahlquist, and good cause appearing therefore,  
3 **IT IS HEREBY ORDERED** that:

- 4           1.     This action is dismissed *with* prejudice as to the individual claims of Plaintiff  
5                 Nic Dahlquist;
- 6           2.     The parties have resolved all issues concerning attorney's fees and costs.

7  
8  
9 **IT IS SO ORDERED.**

10 Dated: \_\_\_\_\_

\_\_\_\_\_  
11 HONORABLE JOHN W. HOLCOMB  
12 UNITED STATES DISTRICT JUDGE  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28