

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

JOSHUA WALZ, individually and on behalf
of all those similarly situated,

Plaintiff,

v.

WALMART INC., a Foreign Profit
Corporation; DELIVERY DRIVERS INC., a
Foreign Profit Corporation; and ASHLEY
HATFIELD, individually and her marital
community, if any,

Defendants.

Case No. 3:23-cv-06083-BHS

**JOINT STIPULATED MOTION FOR
DISMISSAL WITH PREJUDICE**

Note on Motion Calendar: January 21, 2025
Without Oral Argument

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Joshua Walz (“Plaintiff”), and Defendants Walmart Inc. and Ashley Hatfield (collectively, “Defendants”), by and through their undersigned counsel of record, hereby jointly move for the entry of an Order of Dismissal With Prejudice of this action.

WHEREAS, Plaintiff and Defendants have reached a settlement of all disputes, issues and claims asserted in this action;

THEREFORE, the Parties hereby stipulate to dismiss the above-captioned matter with prejudice, with each party to bear their own costs and fees.

Respectfully submitted this 21st day of January, 2025.

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By: /s/ James B. Pizl

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OGLETREE, DEAKINS, NASH, SMOAK
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By: /s/ Allison Bader

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*Attorneys for Defendants Walmart Inc. and
Ashley Hatfield*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of January, 2025, I served the foregoing JOINT STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE via the method(s) below on the following parties:

James B. Pizl, WSBA #28969
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Attorneys for Plaintiff Joshua Walz

Attorneys for Plaintiff Joshua Walz

- ☒ by electronic means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by mailing a true and correct copy to the last-known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- ☐ by e-mailing a true and correct copy to the last-known email address of each person listed above.

SIGNED THIS 21st day of January, 2025 at Los Angeles, California.

/s/ Scott Voelz
 Scott Voelz

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7 **UNITED STATES DISTRICT COURT**
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10 JOSHUA WALZ, individually and on behalf of
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18

Case No. 3:23-cv-06083-BHS

**[PROPOSED] ORDER GRANTING
JOINT STIPULATED MOTION FOR
DISMISSAL WITH PREJUDICE**

19 Plaintiff Joshua Walz (“Plaintiff”), and Defendants Walmart Inc. and Ashley Hatfield
20 (collectively, “Defendants”) have filed their Joint Stipulated Motion for Dismissal With Prejudice.

21 IT IS HEREBY ORDERED that the Parties’ Joint Stipulated Motion for Dismissal With
22 Prejudice is hereby GRANTED, and the above-captioned matter is dismissed with prejudice, with
23 each party to bear their own costs and fees.

24
25 Dated: _____, 2025

JUDGE BENJAMIN H. SETTLE
UNITED STATES DISTRICT COURT

1 Prepared By:

2 OGLETREE, DEAKINS, NASH, SMOAK
3 & STEWART, P.C.

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17 abader@omm.com
18 jbutts@omm.com

19 *Attorneys for Defendants Walmart Inc. and Ashley Hatfield*

20 Approved as to Form; Presentation Waived:

21 **ENTENTE LAW PLLC**

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Attorneys for Plaintiff Joshua Walz

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- ☒ by electronic means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
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- ☐ by e-mailing a true and correct copy to the last-known email address of each person listed above.

SIGNED THIS 21st day of January, 2025 at Los Angeles, California.

/s/ Scott Voelz
Scott Voelz