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PREVENT GUN VIOLENCE**

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*Attorneys for Plaintiff John Lindsay-Poland*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JOHN LINDSAY-POLAND,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE; and BUREAU OF ALCOHOL,  
TOBACCO, FIREARMS AND  
EXPLOSIVES,

Defendants.

) CASE NO. 3:22-CV-07663-EMC

) **STIPULATION AND ~~PROPOSED~~ ORDER OF**  
) **VOLUNTARY DISMISSAL**

) Judge: Hon. Edward M. Chen

Plaintiff John Lindsay-Poland and Defendants United States Department of Justice and Bureau of Alcohol, Tobacco, Firearms and Explosives (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate as follows:

1. Execution of this Stipulation and its approval by the Court shall constitute dismissal of this case with prejudice pursuant to Fed. R. Civ. P. 41(a).
2. This Stipulation is binding upon and inures to the benefit of the Parties hereto and their

1           respective successors, officers, agents, servants, employees and assigns.

2           3. The Parties agree that they will each incur their own costs in this case.

3           4. This Stipulation shall constitute the entire agreement between the Parties, and it is expressly  
4           understood and agreed that this Stipulation has been freely and voluntarily entered into by the  
5           Parties hereto. The Parties further acknowledge that no warranties or representations have been  
6           made on any subject other than as set forth in this Stipulation.

7           IT IS SO STIPULATED.

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Respectfully submitted,

/s/ Elizabeth Vicens

BRIAN M. BOYNTON  
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/s/ Pardis Gheibi<sup>1</sup>

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: July 1, 2024

  
\_\_\_\_\_  
The Honorable Edward M. Chen  
United States District Judge

<sup>1</sup> In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.