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*Attorneys for Plaintiff
Christine DiBella
and the Proposed Classes*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY,
STEVE RELYEA, Acting Chancellor of
California State University, in his official
capacity; JOLENE KOESTER, incoming
Interim Chancellor of California State
University, in her official capacity;
JEFFREY D. ARMSTRONG, President of
California Polytechnic State University,
San Luis Obispo, in his official capacity;
ERIKA D. BECK, President of California
State University, Northridge, in her official
capacity; SORAYA M. COLEY, President
of California Polytechnic State University,
Pomona, in her official capacity; JANE

CASE NO. 3:21-cv-08461-TLT
Civil Rights

**STIPULATION AND ~~[PROPOSED]~~ ORDER
OF DISMISSAL WITH PREJUDICE**

1 CLOSE CONOLEY, President of
 2 California State University, Long Beach, in
 3 her official capacity; WILLIAM A.
 4 COVINO, President of California State
 5 University, Los Angeles, in his official
 6 capacity; THOMAS A. CROPPER,
 7 President of California State University
 8 Maritime Academy, in his official capacity;
 9 ADELA DE LA TORRE, President of San
 10 Diego State University, in her official
 11 capacity; GAYLE E. HUTCHINSON,
 12 President of California State University,
 13 Chico, in her official capacity; TOM
 14 JACKSON, JR., President of California
 15 Polytechnic State University, Humboldt, in
 16 his official capacity; SAÚL JIMÉNEZ-
 17 SANDOVAL, President of California State
 18 University, Fresno, in his official capacity;
 19 ELLEN N. JUNN, President of California
 20 State University, Stanislaus, in her official
 21 capacity; LYNN MAHONEY, President of
 22 San Francisco State University, in her
 23 official capacity; TOMÁS D. MORALES,
 24 President of California State University,
 25 San Bernardino, in his official capacity;
 26 ROBERT S. NELSEN, President of
 27 California State University, Sacramento, in
 28 his official capacity; ELLEN J.
 NEUFELDT, President of California State
 University, San Marcos, in her official
 capacity; EDUARDO M. OCHOA,
 President of California State University,
 Monterey Bay, in his official capacity;
 THOMAS A. PARHAM, President of
 California State University, Dominguez
 Hills, in his official capacity; STEPHEN
 PEREZ, President of San Jose State
 University, in his official capacity; JUDY
 K. SAKAKI, President of Sonoma State
 University, in her official capacity;
 CATHY A. SANDEEN, President of
 California State University, East Bay, in
 her official capacity; FRAMROZE
 VIRJEE, President of California State
 University, Fullerton, in his official
 capacity; RICHARD YAO, President of
 California State University, Channel
 Islands, in his official capacity;

LYNNETTE ZELEZNY, President of
California State University, Bakersfield, in
her official capacity; COMPASS GROUP
USA, INC. dba CHARTWELLS HIGHER
EDUCATION,

Defendants.

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Attorneys for Defendants
BOARD OF TRUSTEES OF THE CALIFORNIA
STATE UNIVERSITY and individual defendants
(see complete list of individual defendants on signature page)

STIPULATION

Plaintiff CHRISTINE DIBELLA and Defendants BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY, STEVE RELYEA, Acting Chancellor of California State
University, in his official capacity; JOLENE KOESTER, incoming Interim Chancellor of
California State University, in her official capacity; JEFFREY D. ARMSTRONG, President of
California Polytechnic State University, San Luis Obispo, in his official capacity; ERIKA D.
BECK, President of California State University, Northridge, in her official capacity; SORAYA
M. COLEY, President of California Polytechnic State University, Pomona, in her official
capacity; JANE CLOSE CONOLEY, President of California State University, Long Beach, in
her official capacity; WILLIAM A. COVINO, President of California State University, Los
Angeles, in his official capacity; THOMAS A. CROPPER, President of California State
University Maritime Academy, in his official capacity; ADELA DE LA TORRE, President of
San Diego State University, in her official capacity; GAYLE E. HUTCHINSON, President of
California State University, Chico, in her official capacity; TOM JACKSON, JR., President of
California Polytechnic State University, Humboldt, in his official capacity; SAÚL JIMÉNEZ-

SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; EDUARDO M. OCHOA, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of California State University, Bakersfield, in her official capacity – Plaintiff and Defendant together the “Parties” – by and through their respective counsel, hereby stipulate and request, pursuant to FRCP Rule 41(a), that the Court order that all of Plaintiff’s claims against Defendants in this action be dismissed with prejudice.

Date: October 5, 2023

REIN & CLEFTON

/s/ Aaron Clefton

By: AARON CLEFTON, Esq.

Attorney for Plaintiff

CHRISTINE DiBELLA

Date: October 5, 2023

CLYDE & CO US LLP

/s/ Alison K. Be anum

By ALISON K. BEANUM, Esq.

Attorney for Defendant

BOARD OF TRUSTEES OF THE

CALIFORNIA STATE UNIVERSITY

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on October 5, 2023, I, Aaron Clefton, attorney with Rein & Clefton, received the concurrence of Alison Beanum, Esq in the filing of this document.


/s/ Aaron Clefton
Aaron Clefton

~~PROPOSED~~ ORDER

Pursuant to stipulation of the parties, and for good cause shown, all of the pending claims in this action are hereby dismissed with prejudice.

IT IS SO ORDERED.

Dated: October 6, 2023



Honorable Trina L. Thompson
U.S. District Court Judge