

1 Antionette Dozier (SBN 244437)
adozier@wclp.org

2 Jodie Berger (SBN 124144)
jberger@wclp.org

3 Rebecca Miller (SBN 317405)
rmiller@wclp.org

4 Richard Rothschild (SBN 67356)
rrothschild@wclp.org

5 Robert Newman (SBN 86534)
rnewman@wclp.org

6 **WESTERN CENTER ON LAW & POVERTY**

3701 Wilshire Blvd., Suite 208

7 Los Angeles, CA 90010

T: (213) 235-2617

8 F: (213) 487-0242

9 Lori Rifkin (SBN 244081)

lrifkin@impactfund.org

10 Fawn Rajbhandari-Korr (SBN 315888)

fkorr@impactfund.org

11 Meredith Dixon (SBN 346864)

mdixon@impactfund.org

12 Megan Flynn (SBN 359394)

mflynn@impactfund.org

13 **IMPACT FUND**

2080 Addison St., Suite 5

14 Berkeley, CA 94704

T: (510) 845-3473

15 F: (510) 845-3654

16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**

19 KALI RAE PERRONE, ANIKA OKJE
ERDMANN-BROWNING and CYNTHIA
20 DE LA MORA, individually and on behalf
of all others similarly situated,

21 Plaintiffs,

22 v.

23 BROOKE ROLLINS, Secretary, United
States Department of Agriculture, in her
24 official capacity; RUSSELL VOUGHT,
Director of the United States Office of
25 Management and Budget, in his official
capacity,

26 Defendants.

Case No.: 3:25-cv-09508-AMO

**STIPULATED REQUEST &
[PROPOSED] ORDER TO
VOLUNTARILY DISMISS COMPLAINT
WITHOUT PREJUDICE**

CLASS ACTION

Action filed: November 4, 2025

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

BRETT A. SHUMATE
Assistant Attorney General

TYLER BECKER
Counsel to the Assistant Attorney General

JOSEPH E. BORSON
Assistant Branch Director
Federal Programs Branch

/s/ Jason Altabet

JASON ALTABET
(Md. Bar No. 2211280012)
Trial Attorney, U.S. Department of Justice
Tel.: (202) 305-0727
Email: jason.k.altabet2@usdoj.gov
1100 L Street, N.W. 20005
Washington, D.C. 20005

Attorneys for the United States

[PROPOSED] ORDER

Pursuant to the Parties' stipulation, the case is voluntarily dismissed without prejudice.

IT IS SO ORDERED.

Dated: _____

Hon. Araceli Martínez-Olguín
United States District Court Judge