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UNIVERSITY OF CALIFORNIA

[Exempt from filing fees – Gov’t Code § 6103]

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA, ANACAPA DIVISION**

ROBIN UNANDER, an individual,

Plaintiff,

v.

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: 20CV03768
*Assigned for all purposes to the Hon.
Colleen K. Sterne, Dept. SB-5*

**STIPULATION AND [PROPOSED]
ORDER RE REQUEST FOR
DISMISSAL WITHOUT PREJUDICE**

*[Concurrently filed with Declaration of Erin R.
Parks]*

Complaint Filed: 11/16/2020
Trial Date: None set

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD.

THE PARTIES hereby stipulate to the following, and upon a showing of good cause, request
the Court grant their proposed order on this stipulation:

WHEREAS, on November 16, 2020, Plaintiff Robin Unander (“Plaintiff”) filed her initial
complaint in this matter. (Declaration of Erin R. Parks (“Parks Decl.”) at ¶ 2.)

WHEREAS, on July 26, 2021, Plaintiff filed a second amended complaint. (Parks Decl. at
¶ 4.)

WHEREAS, on August 26, 2021, Defendant The Regents of the University of California
 (“The Regents”) demurred to Plaintiff’s second amended complaint. (*Id.*)

1 WHEREAS, on November 1, 2021, the Court heard The Regents' demurrer to Plaintiff's
2 second amended complaint and took the matter under submission. (*Id.*)

3 WHEREAS, on December 27, 2021, the Court issued an Order vacating submission and
4 setting a new briefing schedule and hearing on The Regents' demurrer to the second amended
5 complaint. (*Id.*)

6 WHEREAS, the parties attended a successful full-day mediation with Lol Sorensen on
7 February 28, 2022; (*Id.*, ¶ 7.)

8 WHEREAS, the parties have finalized a long form settlement agreement providing for
9 resolution of the matter ("Agreement"); (*Id.*, ¶ 7.)

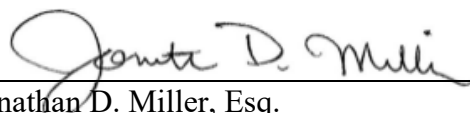
10 WHEREAS, Defendant filed a Notice of Settlement on March 18, 2022. (*Id.*, ¶ 11.)

11 WHEREAS, Defendant's demurrer to Plaintiff's second amended complaint is set to be
12 heard on April 11, 2022; (*Id.*, ¶ 2.)

13 WHEREAS, the parties therefore request that the Court enter an Order dismissing Plaintiff's
14 second amended complaint as to the entire action of all parties and all causes of action without
15 prejudice for the reasons explained in the concurrently filed declaration of Plaintiff's counsel,
16 Erin R. Parks, and retain jurisdiction over the Action under Code of Civil Procedure § 664.6 until
17 all terms of the Agreement have been fully carried out.

18
19 Dated: March 18, 2022

NYE, STIRLING, HALE & MILLER, LLP

20 By: 
21 Jonathan D. Miller, Esq.
22 Alison Bernal, Esq.
23 Attorneys for Defendant, THE REGENTS OF
THE UNIVERSITY OF CALIFORNIA

24 Dated: March 18, 2022

ERIN R. PARKS

25 *ERIN R. PARKS*
26 By: _____
27 Erin R. Parks, Esq.
28 Attorney for Plaintiff, ROBIN UNANDER

1 **[PROPOSED] ORDER**

2 The Court has read and considered the stipulation of the parties, and finding good cause
3 therefore, makes the following order:

4 The entire action of all parties and all causes of action therein is dismissed without prejudice.

5
6 Dated: _____

7 HON. COLLEEN STERNE
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Santa Barbara, State of California. My business address is 33 West Mission Street, Suite 201, Santa Barbara, California 93101.

On March 18, 2022, I served ☐ the originals ☒ true copies of the following document(s) described as:

STIPULATION AND [PROPOSED] ORDER RE REQUEST FOR DISMISSAL WITHOUT PREJUDICE

on the interested parties in this action as follows:

Erin R. Parks, Esq.
625 E. Victoria Street,
Garden Suite
Santa Barbara, CA 93103
E: Law@erinParks.com
P: (805) 899-7717

Counsel for Plaintiff Robin Unander

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Due to Governor Newsom's Stay at Home order in response to the Coronavirus (COVID-19) pandemic, this office will be working remotely, has limited access to physical mail, and is therefore only using electronic mail. I caused the document(s) to be sent from e-mail address marisol@nshmlaw.com to the person(s) at the email address listed.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 18, 2022, at Santa Barbara, California.


MARISOL RAMIREZ