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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 JAQUELYN KLEINER, on behalf of herself)
and all others similarly situated,)

14)
15 Plaintiff,)

16 v.)

17 DIGITAL MEDIA ACADEMY, INC. d/b/a)
18 MEDIA ACADEMY LIMITED)
PARTNERSHIP,)

19 Defendant.)
20)
21)

Case No.: 3:20-cv-04591-EMC

**STIPULATION OF VOLUNTARY
DISMISSAL WITH PREJUDICE**

1 Plaintiff Jaquelyn Kleiner and Defendant Digital Media Academy Corp. stipulate as
2 follows pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii):

3 The claims asserted by Ms. Kleiner in her individual capacity are dismissed with
4 prejudice. The claims asserted on behalf of a putative class are dismissed without prejudice. No
5 class has been certified and no motion for class certification is pending. Plaintiff and Defendant
6 shall each bear their own costs.

7
8 Dated: April 13, 2021

Signed: /s/ Joseph G. Sauder
Joseph G. Sauder (*phv*)
Attorney for Plaintiff

Signed: /s/ Robert E. Freitas
Robert E. Freitas
Attorney for Defendant