

1 **CLEARY GOTTLIEB STEEN**
2 **& HAMILTON LLP**

3 Heather S. Nyong’o (SBN 222202)
4 (415) 796-4400

5 hnyongo@cgsh.com
6 650 California Street Suite 2000
7 San Francisco, CA 94108

8 Elizabeth Vicens (Admitted *Pro Hac Vice*)
9 Andrew G. Khanarian (Admitted *Pro Hac Vice*)
10 One Liberty Plaza
11 New York, NY 10006

12 **GIFFORDS LAW CENTER TO**
13 **PREVENT GUN VIOLENCE**

14 David Pucino (Admitted *Pro Hac Vice*)
15 William T. Clark (Admitted *Pro Hac Vice*)
16 244 Madison Ave., Suite 147
17 New York, NY 10016

18 *Attorneys for Plaintiff John Lindsay-Poland*

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

22 JOHN LINDSAY-POLAND,

23 Plaintiff,

24 v.

25 UNITED STATES DEPARTMENT OF
26 JUSTICE; and BUREAU OF ALCOHOL,
27 TOBACCO, FIREARMS AND
28 EXPLOSIVES,

Defendants.

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

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

) Judge: Hon. Edward M. Chen

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

- 25 1. Execution of this Stipulation and its approval by the Court shall constitute dismissal of this case
26 with prejudice pursuant to Fed. R. Civ. P. 41(a).
- 27 2. This Stipulation is binding upon and inures to the benefit of the Parties hereto and their
28

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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/s/ Elizabeth Vicens

CLEARY GOTTLIEB STEEN
& HAMILTON LLP
Heather S. Nyong'o (SBN 222202)
hnyongo@cgsh.com
650 California Street Suite 2000
San Francisco, CA 94108

Elizabeth Vicens (Admitted *Pro Hac Vice*)
Andrew Khanarian (Admitted *Pro Hac Vice*)
One Liberty Plaza
New York, NY 10006

GIFFORDS LAW CENTER TO
PREVENT GUN VIOLENCE
Esther Sanchez-Gomez (SBN 330408)
268 Bush Street # 555
San Francisco, CA 94104

David Pucino (Admitted *Pro Hac Vice*)
William T. Clark (Admitted *Pro Hac Vice*)
244 Madison Ave., Suite 147
New York, NY 10016

Attorneys for Plaintiff John Lindsay-Poland

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: July 1, 2024

Respectfully submitted,
BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

MARCIA BERMAN
Assistant Director, Federal Programs Branch

/s/ Pardis Gheibi¹

Pardis Gheibi
Trial Attorney (D.C. Bar No. 90004767)
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20530
pardis.gheibi@usdoj.gov
Telephone: (202) 305-7632

Counsel for Defendants



The Honorable Edward M. Chen
United States District Judge

¹ 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.