

1 **GERAGOS & GERAGOS**

2 A PROFESSIONAL CORPORATION
3 LAWYERS
4 HISTORIC ENGINE Co. No. 28
5 644 SOUTH FIGUEROA STREET
6 LOS ANGELES, CALIFORNIA 90017-3411
7 TELEPHONE (213) 625-3900
8 FACSIMILE (213) 232-3255
9 GERAGOS@GERAGOS.COM

10 **MARK GERAGOS** SBN 108325
11 **BEN J. MEISELAS** SBN 277412
12 Attorneys For Plaintiff John Doe, by and through his
13 Guardian *Ad Litem* Lynette Young, on
14 behalf of himself and all others similarly situated

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **JOHN DOE**, a minor by and through
18 his Guardian *Ad Litem* Lynette Young,
19 on behalf of himself and all others
20 similarly situated,

21 **Plaintiffs,**

22 **vs.**

23 **SNAPCHAT, INC.**, A Delaware
24 Corporation, and **DOES 1-20**

25 **Defendants.**

Case No. 2:16-cv-04955-SJO-FFM

**STIPULATION TO DISMISS
WITHOUT PREJUDICE**

Assigned to Judge S. James Otero

GERAGOS & GERAGOS, APC
HISTORIC ENGINE CO. NO. 28
644 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017-3411

GERAGOS & GERAGOS, APC
HISTORIC ENGINE CO. NO. 28
644 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017-3411

1 Plaintiff John Doe, by and through his *guardian ad litem* Lynette Young, and
2 Defendant Snapchat, Inc., by and through their respective counsel, hereby stipulate as
3 follows:

4 1. Plaintiff John Doe and Defendant Snapchat, Inc. have engaged in an informal
5 exchange of facts and legal arguments and are discussing the potential resolution of this
6 matter out of court. The parties will enter into a tolling agreement in the interim.

7 2. Due to the pending response/motion to dismiss deadline and because Plaintiff's
8 position will not be prejudiced by dismissal without prejudice, Plaintiff's action should be
9 dismissed without prejudice.

10
11 IT IS SO STIPULATED.

12 DATED: October 28, 2016

GERAGOS & GERAGOS, APC

13
14
15 By: /s/ Ben Meiselas
16 BEN MEISELAS
17 Attorney for Plaintiff John Doe, by
and through his Guardian Ad Litem
Lynette Young, on behalf of himself
and all others similarly situated

18 DATED: October 28, 2016

COOLEY LLP

19
20
21 By: /s/ Benjamin Kleine
22 BENJAMIN KLEINE
23 Attorney for Defendant Snapchat, Inc.