

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 18-cv-03204-RBJ-NRN

LORI FRANK,

Plaintiff,

v.

CITY OF FORT COLLINS, a municipality, and  
JEROME SCHIAGER, former Deputy Chief of Police, in his individual capacity,

Defendants.

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**STIPULATION FOR DISMISSAL WITH PREJUDICE  
OF DEFENDANT JEROME SCHIAGER**

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Plaintiff, Lori Frank, and Defendants, Jerome Schiager and the City of Fort Collins, submit this Stipulation pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) dismissing Defendant Schiager from this case, with prejudice. Ms. Frank and Mr. Schiager agree to pay her or his own attorney fees and costs as to this dismissal, and also agree to release each other from all claims or potential claims they may have.

Respectfully submitted,

Date: March 5, 2020

s/ Jennifer Robinson

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Jennifer Robinson  
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ATTORNEY FOR PLAINTIFF

Date: March 5, 2020

s/ David R. DeMuro  
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Date: March 5, 2020

s/ Cathy Havener Greer  
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COLLINS

CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> day of March, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

**Jennifer Robinson**  
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and I hereby certify that the foregoing was placed in the U.S. Mail, postage prepaid, and addressed to the following:

[none]

s/ David R. DeMuro  
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David R. DeMuro