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5	Facsimile: (888) 775-0898		
6 7	Attorneys for Plaintiff David Sinegal		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	David Sinegal, an individual,	Case No. 3:19-cv-00101-YGR	
12	Plaintiff,	Judge: Yvonne Gonzalez Rogers	
13	VS.	STIPULATION AND <del>[PROPOSED]</del> ORDER FOR ENTRY OF FINAL JUDGMENT	
14	Sensei International, LLC, a New York Limited Liability Company; and Omar Khan, an	*as modified by the Court*	
15	individual,	as mounted by the court	
16	Defendants.		
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	- 1 - STIPULATION AND [PROPOSED] ORDER FOR ENTRY OF FINAL JUDGMENT  8		
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IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff David Sinegal ("Sinegal") and his attorneys Hueston Hennigan LLP, and Defendants Sensei International, LLC ("Sensei") and Omar Khan ("Khan," and together with Sensei and Sinegal, the "Parties") and their attorneys Miller Nash Graham & Dunn LLP, that the Court may enter the attached Stipulated Final Judgment.

## IT IS HEREBY FURTHER STIPULATED AND AGREED by and among the Parties that:

- 1. This Court has personal jurisdiction over them and each of them for purposes of this action only. Such stipulated jurisdiction is not an waiver of any defense or admission that jurisdiction over Sensei or Khan is proper in other matters before any court in the State of California.
  - 2. This Court has subject matter jurisdiction over this matter.
  - 3. Venue as to this matter between the parties relating thereto lies in this Court.
- 4. Sinegal filed a complaint in this action on January 7, 2019 (the "Complaint"). asserting four claims under California law: breach of contract; fraud; unfair business acts and practices in violation of California Business & Professions Code § 17200; and untrue and misleading advertising in violation of California Business & Professions Code § 17500. Sensei and Khan moved to dismiss for lack of personal jurisdiction and moved to quash the summonses on April 16, 2019. Sensei and Khan neither admit nor deny the allegations in the Complaint.
- 5. The Parties stipulate that the Court may now enter judgment in favor of Sinegal and against Defendants on the Complaint in the amount of \$125,000.
- 6. The Parties waive their rights to move for a new trial or to otherwise seek to set aside the Stipulated Final Judgment through any collateral attack, and further waive their rights to appeal from the Stipulated Final Judgment, except that the Parties, and each of them, agree that this Court shall retain jurisdiction for the purpose of enforcement of this Stipulation and Stipulated Final Judgment only.

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1	IT IS SO STIPULATED AND AGREED.	
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3	Dated: June 24, 2019	Respectfully submitted,
4		HUESTON HENNIGAN LLP
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6		By: Moez M. Kaba
7		Attorneys for Plaintiff David Sinegal
8	Dated: June 24, 2019	MILLER NASH GRAHAM & DUNN LLP
9		M
10		By:
11		Phillip Allan Trajan Perez Attorneys for Defendants Sensei
12		International, LLC and Omar Khan
13	Dated:	DAVID SINEGAL
14		Du Dail & Suin D06/24/19
15		By: David Sinegal 06/24/19
16		Plaintiff
17	Dated:June 20, 2019	SENSEI INTERNATIONAL, LLC
18		
19		By: Omar Khan
20		For Defendant Sensei International, LLC Omar Khan
21	I 20 2010	
22	Dated: June 20, 2019	OMAR KHAN
23		By: Omar Khan
24		By: Omar Khan  Defendant Omar Khan
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1	UNITED STATES DISTRICT COURT		
2	NORTHERN DISTRICT OF CALIFORNIA		
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4	David Sinegal, an individual,	Case No. 3:19-cv-00101-YGR	
5	Plaintiff,	Judge: Yvonne Gonzalez Rogers	
6	VS.	<del>[PROPOSED]</del> ORDER FOR ENTRY OF FINAL JUDGMENT	
7 8	Sensei International, LLC, a New York Limited Liability Company; and Omar Khan, an individual,	PHAL JUDGMENT	
9	Defendants.		
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11	Plaintiff David Sinegal ("Sinegal") and Defendants Sensei International, LLC ("Sensei")		
12	and Omar Khan ("Khan," and together with Sensei and Sinegal, the "Parties") having stipulated		
13	that this Court has jurisdiction over them for the present matter:		
14	IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:		
15	<u>JURISDICTION</u>		
16	1. This Court has subject matter jurisdiction under 28 U.S.C. § 1332 as the matter is		
17	between citizens of different states and the amount in controversy exceeds \$75,000.		
18	ENTRY OF JUDGMENT		
19	2. Pursuant to the Stipulation, judgment is hereby entered for Plaintiff Sinegal and		
20	against Defendants Sensei and Khan in the amou	nt of \$125,000.	
21	MONETA	RY RELIEF	
22	3. Defendants Sensei and Khan are jointly and severally ordered to pay to Sinegal the		
23	amount of ONE-HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS USD (\$125,000		
24	USD).		
25	RETENTION OF JURISDICTION		
26	4. This Court shall retain jurisdiction of this matter only for the purpose of enabling the		
27	Parties to apply to the Court, for good cause shown, for such further orders and directives as may be		
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	- 4 - STIPULATION AND (PROPOSED) ORDER FOR ENTRY OF FINAL JUDGMENT  4		

1	necessary or appropriate for the enforcement of this Judgement or compliance therewith, until
2	satisfaction of the Judgment in full or for a period of one year, whichever occurs first.
3	EFFECT AND ENTRY
4	5. The parties hereby consent to entry of the foregoing Judgment which shall constitute
5	the final judgment and order in this matter.
6	6. This Judgment may be modified only by order of this Court.
7	7. The Clerk is ordered to immediately enter this Judgment.
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9	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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11	Dated: June 26, 2019 June Hyrlefflee
12	Yvonne Gonzalez Rogers United States District Judge
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## **ATTESTATION** Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from the party signatories above. Dated: June 24, 2019 **HUESTON HENNIGAN LLP**

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document was duly served electronically on all known counsel of record through the Court's Electronic Filing System on the <sup>25th</sup> Day of June, 2019.

Moez M. Kaba