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A. This Stipulated Judgment shall constitute Judgment on all claims for relief under Rule 54(a) of the Federal Rules of Civil Procedure.

B. Defendant, Ms. Cynthisa A. Thomas, shall receive \$28,000.00 (twenty-eight thousand) of the proceeds from the Metropolitan Life Insurance Policy Benefit on deposit with this Court. This Court shall issue a check to be written to her attorneys of record, "IRWIN & IRWIN, LLP CLIENT TRUST ACCOUNT" for the above stated amount.

C. Defendant, Ms. Phyllis E. Willis-Thomas, shall receive all remaining funds from the Metropolitan Life Insurance Policy Benefit Proceeds on deposit with this Court after Defendant Cynthia A. Thomas has been paid her portion as stated above. This Court shall issue a check for Phyllis E. Willis-Thomas to be written to her attorney of record, "LAW OFFICE OF MARCIA BREWER, CLIENT TRUST ACCOUNT" for the above stated remaining amount.

D. This Stipulated Judgment is made in relation to the parties' global settlement of this case and the pending litigation in the Los Angeles Superior Court, Probate Case No. BP 1550661 involving the Estate of William W. Thomas, Jr.

E. Each party is responsible for their own attorney's fees and costs associated with this matter. This Stipulated Judgment is not intended to be for, or against, either Defendant and is being made as an agreed upon neutral resolution.

F. This Stipulated Judgment settles all claims, and counter-claims in this matter. The parties respectfully request that this proposed Stipulated Judgment be entered and terminate this case. The Defendants, Phyllis E. Willis-Thomas and Cynthia A. Thomas, agree to cooperate to the extent necessary to confirm the disposition of the MetLife Insurance Policy Benefit funds as Stipulated to in this Judgment.

DATED: 9/21/2015

IT IS SO ORDERED:



Honorable Andrew Guilford
United States District Court Judge