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10 Attorneys for Defendants
 Marriott Vacations Worldwide Corporation,
 11 Marriott Ownership Resorts, Inc., The Ritz-Carlton
 Development Company, Inc., The Ritz-Carlton Sales
 12 Company, Inc., The Ritz-Carlton Management Company,
 LLC, and The Cobalt Travel Company, LLC

13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

16 THOMAS F. REISER JR. AND LINDA T.
 17 REISER, et al.

18 Plaintiffs,

19 v.

20 MARRIOTT VACATIONS WORLDWIDE
 21 CORPORATION, a Delaware corporation, et
 al,

22 Defendants.
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Case No. 2:16-cv-00237-MCE-CKD

**JOINT STIPULATION AND ORDER
 REGARDING DISMISSAL OF
 CONSOLIDATED ACTIONS WITH
 PREJUDICE**

1 TO THE UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA:

2 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the below-listed remaining
3 plaintiffs (collectively, “Plaintiffs”) and defendants Marriott Vacations Worldwide Corporation,
4 Marriott Ownership Resorts, Inc., The Ritz-Carlton Development Company, Inc., The Ritz-
5 Carlton Sales Company, Inc., The Ritz-Carlton Management Company, L.L.C., and The Cobalt
6 Travel Company, LLC (collectively, “Defendants”) stipulate to a dismissal of the entire
7 Consolidated Actions¹, including any and all claims related to the Plaintiffs’ fractional interests
8 and The Ritz-Carlton, Lake Tahoe asserted or could have been asserted in the Consolidated
9 Actions, against all Defendants with prejudice. Unless otherwise agreed to by the parties, each of
10 the parties shall bear their own attorneys’ fees and costs:
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- 12 1. Thomas F. Reiser, Jr., an individual; Linda T. Reiser, an individual; Thomas F. Reiser, Jr.
13 and Linda T. Reiser, as Trustees of the Tom and Linda Reiser Trust dated June 6, 2006;
14 Keith A. Briar, an individual; Beverly C. Briar, an individual; and Keith A. Briar and
15 Beverly C. Briar, as Trustees of the Briar Family Trust UAD 12/21/04
- 16 2. Anthony J. Bates, an individual; and Anthony J. Bates, as Trustee of The Anthony J.
17 Bates Revocable Trust dated December 28, 2007
- 18 3. Al P. Brende, an individual;
- 19 4. Russell D. Frazier, an individual; Shannon M. Frazier, an individual; and Russell D.
20 Frazier and Shannon M. Frazier, as Trustees of the Frazier Family Revocable Trust,
21 Dated January 30, 2008
- 22 5. Jason Michael Girzadas, an individual; and Virginia Harley Girzadas
- 23 6. George Michael Hewitt, an individual; and Rose A. Hewitt, an individual
- 24 7. Bretton H. Jameson, an individual; and Amy M. Jameson, an individual
- 25 8. Brent M. Jones, an individual; Dana Jones, an individual; and Brent M. Jones and Dana
26 Jones, as Trustees of the Jones 1990 Living Trust dated July 27, 1990
- 27 9. Jennifer Kaplan, an individual; and Alexander H. Busansky, an individual
- 28 10. Stephen F. Lim, an individual
11. Michael Lundahl, an individual; and Verlyn Lundahl, an individual

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26 ¹ The consolidated actions consist of: (1) *Thomas F. Reiser, Jr., et al. v. Marriott Vacations*
27 *Worldwide Corporation, et al.*, assigned lead Case No. 2:16-cv-00237-MCE-CKD, filed on
28 February 5, 2016, (2) *Arjun Bhagat, et al. v. Marriott Vacations Worldwide Corporation, et al.*,
Case No. 2:16-cv-01465-MCE-CKD, filed on June 28, 2017; and (3) *Christopher B. Ehrlich, et*
al., v. Marriott Vacations Worldwide Corporation, et al., Case No. 2:17-cv-00952-MCE-CKD,
filed on May 15, 2017 (collectively, the “Consolidated Actions”).

- 1 12. Mark Markland, an individual; Tricia Markland, an individual; and Mark Markland and
Tricia Markland, as Trustees of the Markland Family Trust, dated September 7, 1995
- 2 13. Craig Mattson, an individual
- 3 14. Susan L. Moyer, an individual; and Susan L. Moyer, as Trustee of the Susan Moyer
Revocable Living Trust Dated April 18, 2005
- 4 15. Curtis Wayne Ottley, an individual; and Jennifer Ottley, an individual
- 5 16. Charles F. Perrell, an individual; Elizabeth A. Guillaumin, an individual; Charles F.
Perrell and Elizabeth A. Guillaumin, as Trustees of The Charles F. Perrell & Elizabeth A.
6 Guillaumin Living Trust dated June 26, 1998
- 7 17. Cornelius H. Tiebout, an individual; Julie A. Tiebout, an individual; and Cornelius H.
Tiebout and Julie A. Tiebout, as Trustees of the Tiebout Family Trust, dated February
8 13th, 2003
- 9 18. Annette Leah Welton, an individual; Patrick Lloyd Welton, an individual; and Annette
Leah Welton and Patrick Lloyd Welton, as Trustees of the Welton Family Trust, dated
10 January 28, 1992
- 11 19. Gregory S. Yonko, an individual; Janice Yonko, an individual; and Gregory S. Yonko
and Janice Yonko, as Trustees of The Yonko Family Living Trust, Dated April 27, 2004
- 12 20. Arjun Bhagat, an individual; Anita Manwani Bhagat, an individual; and Arjun Bhagat
and Anita Manwani Bhagat, as Trustees of the Bhagat Family Trust, Dated March 24,
13 1995
- 14 21. Jay A Morgeson, an individual; and Donna L Morgeson, an individual
- 15 22. Christopher Band Ehrlich, an individual; and Sara Fried Ehrlich

16 IT IS SO STIPULATED:

17 DATED: January 4, 2019

REISER LAW p.c.

18 THE MEADE FIRM P.C.

19 By: /s/Tyler Meade
20 Tyler Meade, Esq.
Attorneys for Plaintiffs

21 DATED: January 7, 2019

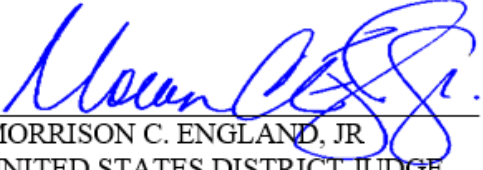
GREENBERG TRAUERIG, LLP

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23 By: /s/ Ian Marx
24 Kurt A. Kappes, Esq.
25 Philip R. Sellinger, Esq.
26 Ian S. Marx, Esq.
27 Attorneys for Defendants
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1 Based on the stipulation of the parties, it is hereby ordered that the entire Consolidated
2 Actions, including any and all claims related to the Plaintiffs' ownership interests asserted in the
3 Consolidated Actions, are hereby dismissed with prejudice, with Plaintiffs and Defendants to
4 bear their own costs and attorneys' fees. The matter having now been concluded in its entirety,
5 the Clerk of court is directed to close the file.

6 **IT IS SO ORDERED.**

7 Dated: January 9, 2019

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10 MORRISON C. ENGLAND, JR.
11 UNITED STATES DISTRICT JUDGE
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