| 1 | GEORGE LAMBERT, ESQ. D.C. bar #979327, Pro Hac Vice LAW OFFICES OF LEONARD J. SUCHANEK AND ASSOCIATES 1025 Connecticut Ave., Suite #1000 Washington D.C. 20036 Telephone: (202) 640-1897 Fax (202) 747 7797, e-mail: LawDC10@aol.com Attorneys for Judgment Creditor and Plaintiff | | |
|-----|--|--|--|
| 2 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | Universal Trading & Investment Co. Inc. | | |
| 7 | | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | NORTHERN DISTRICT OF CALIFORNIA | | |
| 10 | SAN FRANCISCO DIVISION | | |
| 11 | | | |
| 12 | UNIVERSAL TRADING & INVESTMENT CO., INC. | Case No. 08-CV-3632-CRB | |
| 13 | Judgment Creditor, | NOTICE OF DISMISSAL OF CLAIM | |
| 14 | | AGAINST DEFENDANT | |
| 15 | V. | PAUL GULLY-HART | |
| 16 | DUGSBERY, INC.; M. PAVLO LAZARENKO; LADY LAKE | | |
| 17 | INVESTMENT CORP.; FAIRMONT GROUP LTD.; ORBY | AND (PROPOSED) ORDER LIFTING STAY FOR ENTRY OF SAME | |
| 18 | INTERNATIONAL, LTD.; UNITED ENERGY SYSTEMS OF UKRAINE; | | |
| 19 | PFG; SAMANTE LTD.; CREDIT SUISSE GROUP; PAUL GULLY-HART; | | |
| 20 | AURELIO FERRARI; TRUSTEES FOR PAVLO J. LAZARENKO; and DOES | | |
| 21 | from 1 to 100, Defendants. | | |
| 22 | Defendants. | | |
| 23 | | | |
| 24 | Plaintiff Universal Trading & Investment Co. Inc., through its undersigned counsel, | | |
| 25 | 1. Requests that the Court lift the stay that is currently in effect in the above styled | | |
| 26 | action for the sole purpose of entry of this Notice of Dismissal of a claim against Defendant Paul | | |
| 27 | Gully-Hart; and | | |
| 28 | | | |
| | | NOTICE OF DISMISSAL WITH PREJUDICE AND ORDER LIFTING STAY FOR ENTRY OF SAME (CASE NO. 08-CV-3632 CRB)) | |

| 1 | 2. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), hereby dismisses its claim against | |
|----|---|--|
| 2 | Defendant Paul Gully-Hart, with prejudice and without costs. | |
| 3 | Respectfully submitted, | |
| 4 | | |
| 5 | Dated: July 2, 2010 | |
| 6 | Dated. July 2, 2010 | |
| 7 | | |
| 8 | | |
| 9 | Universal Trading & Investment Co | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |

28

