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TROUTMAN SANDERS LLP  
5 PARK PLAZA, SUITE 1400  
IRVINE, CA 92614-2515

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

AXIS REINSURANCE COMPANY,

Plaintiff,

v.

TELEKENEX, INC.; ANTHONY ZABIT;  
KAREN SALAZAR; BRANDON CHANEY;  
DEANNA CHANEY; MARK PRUDELL;  
JOY PRUDELL; MARK RADFORD; NIKKI  
RADFORD; JOSHUA SUMMERS; JULIA  
SUMMERS; IXC HOLDINGS, INC.;  
STRAITSHOT COMMUNICATIONS, INC.;  
STRAITSHOT RC, LLC,

Defendant.

AND RELATED COUNTERCLAIMS

Case No. 3:12-cv-02979-SC

**STIPULATION AND REQUEST FOR  
DISMISSAL WITH PREJUDICE OF:**

- 1) **TELEKENEX, INC., ANTHONY ZABIT, KAREN SALAZAR, BRANDON CHANEY, DEANNA CHANEY, AND IXC HOLDINGS, INC. ("TELEKENEX DEFENDANTS") FROM AXIS REINSURANCE COMPANY'S FIRST AMENDED COMPLAINT; AND**
- 2) **SECOND AMENDED COUNTERCLAIM OF THE TELEKENEX DEFENDANTS IN ITS ENTIRETY**

[Fed. R. Civ. P. 41(a), (c)]

Plaintiff/Counter-Defendant AXIS Reinsurance Company ("AXIS") and Defendants/Counter-Claimants Telekenex, Inc., Anthony Zabit, Karen Salazar, Brandon Chaney, Deanna Chaney, and IXC Holdings, Inc. (collectively, the "Telekenex Defendants") have reached a settlement, one term of which requires the dismissal of their respective claims against each other in this action.

Case No. 3:12-cv-02979-SC

STIPULATION AND REQUEST FOR DISMISSAL OF  
THE TELEKENEX DEFENDANTS AND THEIR  
SECOND AMENDED COUNTERCLAIM

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Now therefore, AXIS and the Telekenex Defendants hereby request and stipulate as follows:

(1) Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff AXIS Reinsurance Company stipulates and agrees to the dismissal of its First Amended Complaint in this action (ECF Doc. No. 15) as to Defendants Telekenex, Inc., Anthony Zabit, Karen Salazar, Brandon Chaney, Deanna Chaney, and IXC Holdings, Inc. only. No other defendants are hereby dismissed.

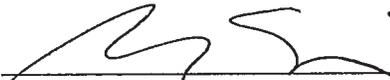
(2) Pursuant to Rule 41(a)(1) and (c) of the Federal Rules of Civil Procedure, Defendants/Counter-Claimants Telekenex, Inc., Anthony Zabit, Karen Salazar, Brandon Chaney, Deanna Chaney, and IXC Holdings, Inc. stipulate and agree to the dismissal of their Second Amended Counterclaim against Plaintiff/Counter-Defendant AXIS Reinsurance Company (ECF Doc. No. 105) in its entirety.

These requested and stipulated dismissals are with prejudice, with each party to bear their own fees and costs. AXIS' First Amended Complaint shall not be dismissed hereby as to the remaining defendants.

Dated: December 20, 2013

Respectfully submitted,

TROUTMAN SANDERS LLP

BY:   
Terrence R. McInnis  
Ross Smith  
*Attorneys for Plaintiff and Counter-Defendant AXIS Reinsurance Company*

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Dated: December 6, 2013

KARR TUTTLE CAMPBELL

BY: *Jacquelyn Beatty*  
J. Dino Vasquez  
Jacquelyn Beatty  
*Attorneys for Defendants/Counter-Claimants  
Telekenex, Inc., IXC Holdings, Inc., Anthony  
Zabit, Karen Salazar, Brandon Chaney, and  
Deanna Chaney*

LAW OFFICES OF STEPHEN R. PAPPAS

*Per telephone authority*  
BY: *Jacquelyn Beatty*  
Stephen R. Pappas  
*Attorneys for Defendants/Counter-Claimants  
Telekenex, Inc., IXC Holdings, Inc., Anthony  
Zabit, Karen Salazar, Brandon Chaney, and  
Deanna Chaney*

**PROPOSED ORDER**

Good cause appearing, the request is GRANTED under the authority of FRCP 41(a)(2).  
IT IS SO ORDERED.

Dated: 01/03/2014

