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11 Attorneys for Counterdefendants Benchmark
 Capital Partners, L.P and Benchmark Capital
 12 Management Co. LLC

13 *[additional stipulating parties on signature page]*

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 NEXTDOR.COM, INC., a Delaware
 18 corporation,

19 Plaintiff,

20 vs.

21 RAJ ABHYANKER, an individual,

22 Defendant.

CASE NO. 3:12-cv-05667-EMC

**STIPULATION AND [PROPOSED] ORDER
 FOR VOLUNTARY DISMISSAL WITH
 PREJUDICE OF DEFENDANT AND
 COUNTERCLAIMANT RAJ ABHYANKER'S
 COUNTERCLAIM FOR MISAPPROPRIATION
 OF TRADE SECRETS AGAINST
 COUNTERDEFENDANTS BENCHMARK
 CAPITAL PARTNERS, L.P., BENCHMARK
 MANAGEMENT CO., LLC, SANDEEP SOOD,
 AND MONSOON ENTERPRISES, INC.**

25 Case Filed: November 5, 2012

26 Judge: Honorable Edward M. Chen

27 *(Caption continues next page)*
 28

1 RAJ ABHYANKER, an individual,
2 Counterclaimant,

3 vs.

4 NEXTDOOR.COM, INC., a Delaware
corporation; PRAKASH
5 JANAKIRAMAN, an individual;
BENCHMARK CAPITAL PARTNERS,
6 L.P., a Delaware limited partnership;
BENCHMARK CAPITAL
7 MANAGEMENT CO. LLC,
a Delaware limited liability company;
8 SANDEEP SOOD, an individual;
MONSOON ENTERPRISES, INC., a
9 California corporation, and DOES 1-50,
inclusive,

10 Counterdefendants.
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1 **STIPULATION OF DISMISSAL**

2 WHEREAS, on April 12, 2013, Defendant and Counterclaimant Raj Abhyanker
3 (“Abhyanker”) filed a First Amended Answer and Counterclaims [Dkt. No. 59] (“FACC”),
4 asserting a counterclaim for trade secret misappropriation against Sandeep Sood and Monsoon
5 Enterprises, Inc. (together, “Monsoon”) and Benchmark Capital Partners, L.P. and Benchmark
6 Capital Management Co., LLC (together, “Benchmark”);

7 WHEREAS, on August 2, 2013, Monsoon answered the FACC [Dkt. No. 104];

8 WHEREAS, on December 5, 2013, Abhyanker filed a Second Amended Answer and
9 Counterclaims [Dkt. No. 132] (“SACC”), asserting a counterclaim for trade secret
10 misappropriation against Monsoon and Benchmark;

11 WHEREAS, on June 5, 2014, Benchmark answered the SACC [Dkt. No. 209];

12 WHEREAS, Abhyanker wishes to dismiss and release all claims against Monsoon, and
13 each of its present and former partners, members, directors, officers, employees, subsidiaries,
14 affiliates, predecessors, successors, insurers, attorneys, stockholders and agents (the “Monsoon
15 Related Parties”), based on the facts and circumstances alleged in the FACC and SACC;

16 WHEREAS, Abhyanker wishes to dismiss and release all claims against Benchmark, and
17 each of its present and former partners, members, directors, officers, employees, subsidiaries,
18 affiliates, funds, predecessors, successors, insurers, attorneys, stockholders and agents (the
19 “Benchmark Related Parties”), based on the facts and circumstances alleged in the FACC and
20 SACC;

21 Pursuant to Federal Rule of Civil Procedure 41(a), the parties stipulate and agree as
22 follows:

- 23 1. Abhyanker hereby dismisses with prejudice all claims or counterclaims against
24 Benchmark and Monsoon in the above-captioned action;
- 25 2. Abhyanker releases all claims against the Benchmark Related Parties and the
26 Monsoon Related Parties, whether known or unknown, based on the facts and
27 circumstances set forth in the FACC and SACC;
- 28

- 1 3. Abhyanker shall not take any further discovery of Benchmark or Monsoon in the
2 above-captioned action, and all pending discovery requests to Benchmark and
3 Monsoon, including but not limited to document requests, interrogatories, and
4 deposition notices, are hereby withdrawn;
5 4. Abhyanker shall have no further obligation to respond to pending discovery requests
6 promulgated by Benchmark or Monsoon; and
7 5. The parties shall bear their own fees and costs.

8 IT IS SO STIPULATED.

9 Dated: June 6, 2014

Respectfully submitted,
LEGALFORCE RAJ ABHYANKER, P.C.

11 By /s/ Bruno W. Tarabichi
12 Bruno W. Tarabichi
13 Heather Norton
14 Scott J. Allen
15 Alex Rudd
16 Brian Orion

Attorneys for Defendant and
Counterclaimant Raj Abhyanker

16 Dated: June 6, 2014

Respectfully submitted,
LATHAM & WATKINS LLP

18 By /s/ Matthew Rawlinson
19 Matthew Rawlinson
20 Julian W. Park

Attorneys for Counterdefendants
Benchmark Capital Partners, L.P., and
Benchmark Capital Management Co. LLC

22 Dated: June 6, 2014

Respectfully submitted,
ROYSE LAW FIRM, P.C.

25 By /s/ Harpeet S. Walia
26 Harpreet S. Walia
27 Lisa M. Chapman
28 Michael Wiesner

Attorneys for Counterdefendants Sandeep
Sood and Monsoon Enterprises, Inc.

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ATTESTATION

Pursuant to Civil Local Rule 5-1, I certify that I obtained in the filing of this document the concurrence from all parties whose electronic signatures appear above.

Dated: June 6, 2014

/s/ Matthew Rawlinson
Matthew Rawlinson

IT IS SO ORDERED.

Dated: 6/9/14

