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Attorneys for Plaintiff NostalgiaConventions.com, LLC
dba Colossalcon

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NOSTALGIACONVENTIONS.COM, LLC,
an Ohio limited liability company *dba*
COLOSSALCON,

Plaintiff,

v.

**COLOSSUS CON *aka* COLOSSUS POP
CULTURE EXPO & COMIC CON *aka*
COLOSSUS POP EXPO,** a business
entity of unknown formation;
**MARINA LUKYANTSEVA *aka* MARINA
LUKYANTSEVA-HAWORTH,** an individual
dba COLOSSUS CON;
DAVIDSON HAWORTH, an individual *dba*
COLOSSUS CON;
**COLOSSUS GIRL ENTERTAINMENT
LLC,** a California limited liability company;
and **DOES 1 through 10,** inclusive,

Defendants.

Case No. 3:17-cv-00695-EMC

**JOINT NOTICE OF SETTLEMENT
AND STIPULATION TO VACATE
AND CONTINUE UPCOMING
HEARINGS;
AND ~~[PROPOSED]~~ ORDER**





1 The parties, Plaintiff NostalgiaConventions.com, LLC *dba* Colossalcon (“Plaintiff”),
2 through counsel, and Defendants Marina Lukyantseva and Davidson Haworth
3 (“Defendants”), hereby notify the Court that they have reached a settlement in principle.
4 The parties’ settlement contemplates injunctive relief to be completed by October 1, 2017,
5 and, if said injunctive relief is completed, the parties intend to thereafter stipulate to
6 dismissal of the action with prejudice.

7 Therefore, to preserve the resources of the parties and the Court, the parties
8 hereby stipulate and request that the Court: (1) vacate the upcoming hearing on
9 Defendants’ Motion to Dismiss, currently scheduled for August 17, 2017, and (2) continue
10 the upcoming status hearing, currently scheduled for September 14, 2017, to October 26,
11 2017, or any convenient date thereafter.

12 IT IS SO STIPULATED.

14 Dated: August 7, 2017

KRONENBERGER ROSENFELD, LLP

15 By: s/ Liana W. Chen
16 Liana W. Chen
Attorneys for Plaintiff

17 Dated: August 7, 2017

DAVIDSON HAWORTH

18 By: s/ Davidson Haworth
19 Defendant Pro Per

20 Dated: August 7, 2017

MARINA LUKYANTSEVA

21 By: s/ Marina Lukyantseva
22 Defendant Pro Per

23 **ATTESTATION OF CONCURRENCE IN FILING**

24 Pursuant to Local Rule 5-1(i)(3), the filer hereby attests that concurrence in the filing
25 of this document has been obtained from each of the other signatories, which shall serve
26 in lieu of their signatures on the document.

27 s/ Liana W. Chen
28 Liana W. Chen

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~~[PROPOSED]~~ ORDER

The Court, having considered the parties' stipulation and finding good cause appearing, hereby orders:

- 1. The August 17, 2017 hearing on Defendants' Motion to Dismiss is HEREBY VACATED.
- 2. The September 14, 2017 status hearing is HEREBY CONTINUED to October 26, 2017 [or _____] at 10:30 a.m.

IT IS SO ORDERED.

Dated: 8/8/2017 _____

