Thomas P. Riley, SBN 194706 1 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 2 1114 Fremont Avenue South Pasadena, CA 91030-3227 3 Tel: 626-799-9797 4 Fax: 626-799-9795 TPRLAW@att.net 5 Attorneys for Plaintiff 6 Joe Hand Promotions, Inc. 7 8 NORTHERN DISTRICT OF CALIFORNIA 9 JOE HAND PROMOTIONS, INC., 10 Plaintiff, 11 12 VS. 13 DANNY CHU, ET AL., 14 Defendants. 15 16 17 18 19 20 21 22 23

UNITED STATES DISTRICT COURT

CASE NO. 4:11-cv-01406-CW

STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS DANNY CHU and ERIC JASON HARAGA individually and d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT and E18TH GROUP, INC., an unknown business entity d/b/a FARENHEIT ULTRA LOUNGE AND RESTAURANT

IT IS HEREBY STIPULATED by and between Plaintiff JOE HAND PROMOTIONS, INC. and Defendants DANNY CHU and ERIC JASON HARAGA, individually and d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTUARANT and E18TH GROUP, INC., an unknown business entity d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT, that the above-entitled action is hereby dismissed with prejudice against DANNY CHU and ERIC JASON HARAGA, individually and d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT and E18TH GROUP, INC., an unknown business entity d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT, and subject to the Court's jurisdiction to enforce the settlement agreement reached between the Parties.

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> STIPULATION OF DISMISSAL Case No. 4:11-cv-01406-CW PAGE 1

This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party referenced-above shall bear its own attorneys' fees and costs. 2 3 Dated: January 24, 2012-5 LAW OFFICES OF THOMAS P. RILEY, P.C. By: Thomas P. Riley 6 Attorneys for Plaintiff 7 JOE HAND PROMOTIONS, INC. 8 9 Dated: 1/25/2012 10 LAW OFFICE OF MATTHEW PARE By: Matthew A. Pare, Esquire 11 Attorney for Defendants DANNY CHU and ERIC JASON 12 HARAGA, individually and d/b/a FAHRENHEIT ULTRA. LOUNGE and E18TH GROUP, INC., an unknown business 13 entity d/b/a FARENHEIT ULTRA LOUNGE 14 15 18 17 IT IS SO ORDERED: 18 19 20 Dated: 2/21/2012 21 United States District Court 22 Northern District of California 23 111 24 111 25 26 111 27 111 28

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PROOF OF SERVICE (SERVICE BY MAIL)

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I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On January 24, 2012, I served:

STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS DANNY CHU and ERIC JASON HARAGA, individually and d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT and E18TH GROUP, INC., an unknown business entity d/b/a FAHRENHEIT ULTRA LOUNGE AND RESTAURANT

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Matthew A. Pare, Esquire (Attorney for Defendants) LAW OFFICE OF MATTHEW PARE 33 H Street, Suite 5059 Chula Vista, CA 91910

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on January 24, 2012, at South Pasadena, California.

Dated: January 24, 2012

ERICA FERNANDEZ

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