

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

JAMES E. GIBBONS (pro hac vice)  
Cal. State Bar No. 130631  
**MANNING & KASS**  
**ELLROD, RAMIREZ, TRESTER LLP**  
801 South Figueroa Street, 15th Floor  
Los Angeles, CA 90017  
Tel. (213) 624-6900  
jeg@manningllp.com

ROBERT W. COHEN (pro hac vice)  
Cal. State Bar No. 150310  
MARIKO TAENAKA (pro hac vice)  
Cal. State Bar No. 273895  
**LAW OFFICES OF ROBERT W. COHEN, A.P.C.**  
1901 Avenue of the Stars, Suite 1900  
Los Angeles, CA 90067  
Tel. (310) 282-7586  
rwc@robertwcohenlaw.com  
mt@robertwcohenlaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHIGE TAKIGUCHI, FUMI NONAKA,  
MITSUAKI TAKITA, TATSURO SAKAI,  
SHIZUKO ISHIMORI, YUKO NAKAMURA,  
MASAAKI MORIYA, HATSUNE HATANO, and  
HIDENAO TAKAMA, individually and on behalf of  
all others similarity situated,

Plaintiff,

v.

MRI INTERNATIONAL, INC., EDWIN J.  
FUJINAGA, JUNZO SUZUKI, PAUL MUSASHI  
SUZUKI, LVT, INC., dba STERLING ESCROW,  
and DOES 1-500,

Defendants.

Case No.: 2:13-cv-01183-HDM-NJK  
Hon. Howard D. McKibben

**STIPULATION AND ORDER**  
**ADDING CATHERINE SUZUKI AS**  
**A PARTY IN HER CAPACITY AS**  
**TRUSTEE OF THE JUNZO**  
**SUZUKI IRREVOCABLE TRUST,**  
**THE KEIKO SUZUKI**  
**IRREVOCABLE TRUST, AND THE**  
**JUNZO SUZUKI AND KEIKO**  
**SUZUKI IRREVOCABLE TRUST**

1 WHEREAS, Junzo and Paul Suzuki and their affiliated entities and trusts (excepting First  
2 Hawaiian Bank), entered into a settlement agreement with plaintiffs on September 20, 2017;

3 WHEREAS, the parties previously sought First Hawaiian Bank's execution of the settlement;

4 WHEREAS, on December 6 and 8, 2017, Junzo, Keiko, Catherine (Ishii), and Paul Suzuki  
5 removed First Hawaiian Bank as trustee of their three irrevocable trusts and appointed Catherine Suzuki  
6 as trustee in its place;

7 WHEREAS, Catherine Suzuki has executed the settlement as the trustee of (1) the Junzo Suzuki  
8 Irrevocable Trust, (2) the Keiko Suzuki Irrevocable Trust, and (3) the Junzo and Keiko Suzuki  
9 Irrevocable Trust;

10 WHEREAS, the addition of Catherine Suzuki as trustee of the trusts will help facilitate Court  
11 approval of the class action settlement; and

12 WHEREAS, Federal Rule of Civil Procedure 21 provides in pertinent part that "[o]n motion or on  
13 its own, the court may at any time, on just terms, add or drop a party..."

14 Based on the forgoing, the parties stipulate as follows:

15 1. That the Court add (1) Catherine Suzuki, trustee of the Junzo Suzuki Irrevocable Trust, (2)  
16 Catherine Suzuki, trustee of the Keiko Suzuki Irrevocable Trust, and (3) Catherine Suzuki, trustee of the  
17 Junzo and Keiko Suzuki Irrevocable Trust, as defendants to this action.

18 Dated: December 11, 2017

MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP

19  
20 By: /s/ James Gibbons  
JAMES E. GIBBONS  
STEVEN J. RENICK  
Attorneys for Plaintiffs

21  
22  
23 LAW OFFICES OF ROBERT W. COHEN  
A Professional Corporation

24  
25  
26 By: /s/ Robert W. Cohen  
ROBERT W. COHEN  
MARIKO TAENAKA  
Attorneys for Plaintiffs

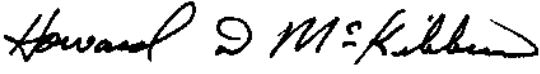
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

PAUL HASTINGS LLP

By: /s/ Nicolas Morgan  
NICOLAS MORGAN  
Attorneys for Defendant Junzo and Paul  
Suzuki

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December 12, 2017

  
United States District Judge