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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
AUTHORIZING THE SALE OF 145
E. HARMON AVE., UNITS 2702 &
2704

1 Plaintiffs Shige Takiguchi, et al. and Defendants (1) Junzo Suzuki, (2) Paul Suzuki, (3) Keiko
2 Suzuki, (4) Suzuki Enterprises, Inc. Profit Sharing Plan (“the SEI PSP”), (5) Catherine (Ishii) Suzuki,
3 trustee of the Junzo Suzuki Irrevocable Trust, (6) Catherine Suzuki, trustee of the Keiko Suzuki
4 Irrevocable Trust, (7) Catherine Suzuki, trustee of the Junzo Suzuki and Keiko Suzuki Irrevocable Trust,
5 (9) Suzuki Enterprises, Inc., (8) Puuikena Investments LLP, (9) Catherine Suzuki, individually and as
6 trustee of the Catherine Suzuki Irrevocable Trust dated May 10, 2013, (10) Paul Musashi Suzuki, trustee
7 of the Paul Musashi Suzuki Irrevocable Trust dated May 10, 2013 (collectively “the Suzuki
8 Defendants”), submit this stipulation and order authorizing sale of real properties located at 145 E.
9 Harmon Avenue, Units 2702 and 2704, Las Vegas, Nevada 89109.

10 WHEREAS, on January 3, 2018, this Court preliminarily approved the settlement with the Suzuki
11 Defendants by orders dated January 3, 2018 (Dkt. 789) and January 11, 2018 (Dkt.797);

12 WHEREAS, on January 3, 2018, the Court also granted the parties’ stipulation to appoint certain
13 brokers for the sale of real properties (Dkt. 790);

14 WHEREAS, pursuant to the Settlement Agreement and the orders of the Court, the Suzuki
15 Defendants retained Heidi Williams of Realty ONE Group on January 22, 2018 and she listed the
16 properties located at 145 E. Harmon Avenue, Units 2702 and 2704, Las Vegas, Nevada 89109
17 (“Properties”) for sale;

18 WHEREAS, upon reviewing the comparable sales in the area and consulting with Ms. Williams,
19 the parties agreed to list the Properties for \$599,888;

20 WHEREAS, on February 15, 2018 the Suzuki Defendants received an offer to purchase the
21 Properties for \$578,888;

22 WHEREAS, on February 16, 2018, upon discussions with Ms. Williams, the parties agreed to
23 present a counter-offer of \$585,000, contingent upon Court approval;

24 WHEREAS, on February 20, 2018, the potential buyer accepted the counter-offer to purchase the
25 Properties for \$585,000;

26 WHEREAS the parties and Ms. Williams believe that it is a strong offer and is in the best interest
27 of the Parties;

28 WHEREAS, a copy of the executed Purchase and Sale Agreement is attached hereto as Exhibit A;

1 and

2 WHEREAS, a declaration from Ms. Williams is attached hereto as Exhibit B;

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

- 4 1. That the Court authorize the sale of 145 E. Harmon Avenue, Units 2702 and 2704, Las
- 5 Vegas, Nevada 89109 for \$585,000 and pursuant to the terms of the Purchase and Sale
- 6 Agreement attached hereto as Exhibit A.

7
8 Dated: February 20, 2018

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

9
10 By: /s/ James Gibbons
11 JAMES E. GIBBONS
12 STEVEN J. RENICK
13 Attorneys for Plaintiffs

14
15 LAW OFFICES OF ROBERT W. COHEN
16 A Professional Corporation

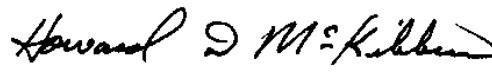
17 By: /s/ Robert W. Cohen
18 ROBERT W. COHEN
19 MARIKO TAENAKA
20 Attorneys for Plaintiffs

21
22 PAUL HASTINGS LLP

23 By: /s/ Nicolas Morgan
24 NICOLAS MORGAN
25 Attorneys for Defendant Junzo and Paul
26 Suzuki

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 DATED: February 26, 2018


United States District Judge