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19 Attorneys for Plaintiffs

20 **UNITED STATES DISTRICT COURT**  
 21 **DISTRICT OF NEVADA**

22 SHIGE TAKIGUCHI, et. al, Individually and  
 23 On Behalf of All Others Similarity Situated,

24 Plaintiffs,

25 v.

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

Defendants.

Case No.: 2:13-cv-01183-HDM-NJK

**STIPULATION AND ORDER RE  
 LIQUIDATION OF LIFE INSURANCE  
 POLICY AND PAYMENT OF FUNDS  
 PURSUANT TO FINAL APPROVAL  
 OF CLASS ACTION SETTLEMENT**

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STIPULATION AND ORDER RE LIQUIDATION OF LIFE INSURANCE POLICIES AND  
 PAYMENT OF FUNDS PURSUANT TO FINAL APPROVAL OF CLASS ACTION SETTLEMENT

1 WHEREAS, plaintiffs Shige Takiguchi, et al. (“Plaintiffs”) and (1) Junzo Suzuki, (2)  
2 Paul Suzuki, (3) Keiko Suzuki, (4) the Suzuki Enterprises, Inc. Profit Sharing Plan, (5) Catherine  
3 Suzuki, trustee of the Junzo Suzuki Irrevocable Trust, (6) Catherine Suzuki, trustee of the Keiko  
4 Suzuki Irrevocable Trust, (7) Catherine Suzuki, trustee of the Junzo Suzuki and Keiko Suzuki  
5 Irrevocable Trust, (8) Suzuki Enterprises, Inc., (9) Puuikena Investments LLP, (10) Catherine  
6 Mai Suzuki, trustee of the Catherine Suzuki Irrevocable Trust dated May 10, 2013, and (11) Paul  
7 Musashi Suzuki, trustee of the Paul Musashi Suzuki Irrevocable Trust dated May 10, 2013  
8 (collectively, the “Suzuki Defendants”) are collectively referred to herein as the “Parties”;

9 WHEREAS, on December 11, 2017 the Suzuki Defendants entered into a Settlement  
10 Agreement with Plaintiffs by which they agreed to surrender and liquidate certain life insurance  
11 policies and pay the surrender value to Plaintiffs as consideration for resolution this action;

12 WHEREAS, on May 22, 2018 the Court granted final approval of the class action  
13 settlement with the Suzuki Defendants (Dkt. 840);

14 WHEREAS, pursuant to the Settlement Agreement, the life insurance policy, Pacific  
15 Guardian Life Policy No. 0007005184 owned by Keiko Suzuki shall be surrendered by the  
16 Suzuki Defendants and liquidated, with the entire surrender proceeds wire transferred to the  
17 Court appointed claims administrator, Heffler Claims Group.

18 WHEREAS, as of June 22, 2018, this Court’s preliminary injunction order (Dkt. 183)  
19 freezing the assets of the Suzuki Defendants is permanently lifted and vacated;

20 NOW, therefore, the Parties stipulate as follows:

- 21 1. Pacific Guardian Life is ordered to process the surrender of Policy No. 0007005184  
22 owned by Keiko Suzuki, and transfer the entire surrender value to the qualified  
23 settlement account designated by Heffler Claims Group; and
- 24 2. The Suzuki Defendants are ordered to reasonably cooperate with Plaintiffs and the  
25 life insurance policy issuers as necessary in effectuating the surrender of the above  
26 policies.

