

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUN 23 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

IN RE: FIRST NATIONAL  
COLLECTION BUREAU, INC  
TELEPHONE CONSUMER  
PROTECTION ACT (TCPA)  
LITIGATION

MDL: 2527

CASE NO. 2:14-cv-00557-  
KJD-CWH (Base File)

THIS DOCUMENT RELATES TO:  
Case No.: 2:13-CV-01206 (Neal v.  
First National Collection Bureau, Inc.)  
Case No.: 13-CV-01303 (Beell v.  
First National Collection Bureau, Inc.)  
Case No.: 13-cv-1515 (Hunter v.  
First National Collection Bureau, Inc.)

STIPULATION TO DIMISS  
INDIVIDUAL CLAIMS WITH  
PREJUDICE AND CLASS CLAIMS  
WITHOUT PREJUDICE

(Proposed Order Attached)

Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiffs, Claudette Neal, Jessica Beell, and Nanette Hunter, and Defendant, First National Collection Bureau, Inc. (individually, a "Party" and collectively, "the Parties") stipulate to dismiss the individual claims with prejudice and the class claims without prejudice, with each Party to bear her or its own attorney's fees, costs and expenses in connection with both the MDL Action and the related individual Actions. A proposed Order is submitted concurrently herewith for the Court's convenience.

Respectfully Submitted,

/s/Todd M. Friedman  
TODD M. FRIEDMAN, ESQ.  
LAW OFFICES OF TODD M. FRIEDMAN, P.C.  
*Counsel for Claudette Neal*  
324 S. Beverly Drive, Suite 725  
Beverly Hills, CA 90212  
Tel: (877) 206-4741  
Fax: (866) 633-0228  
[tfriedman@attorneysforconsumers.com](mailto:tfriedman@attorneysforconsumers.com)

/s/Gary J. Lorch  
GARY J. LORCH, ESQ.  
GORDON & REES, LLP  
*Counsel for First National  
Collection Bureau, Inc.*  
633 West Fifth Street, 52<sup>nd</sup>. Floor  
Los Angeles, CA 90071  
Tel: (213) 576-5000  
Fax: (213) 680-4470  
[glorch@gordonrees.com](mailto:glorch@gordonrees.com)



**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below counsel of record:

Sayed Abbas Kazerounian  
ak@kazlg.com  
Matthew M. Loker  
ml@kazlg.com  
Kazerouni Law Group, APC  
245 Fisher Avenue, Suite D1  
Costa Mesa, CA 92626

Joshua B. Swigart  
josh@westcostlitigation.com  
Hyde & Swigart  
2221 Camino Del Rio South, Suite 101  
San Diego, CA 92108

**Attorneys for Plaintiff, Claudette Neal**

Douglas J. Champion  
doug@djcampion.com  
Law Offices of Douglas J. Champion, APC  
409 Camino Del Rio South, Suite 303  
San Diego, CA 92108

Daniel G. Shay  
danielshay@sandiegobankruptcynow.com  
Law Offices of Daniel G. Shay  
409 Camino Del Rio South, Suite 303  
San Diego, CA 92108

Ronald A. Marron  
ron@consumersadvocate.com  
Alexis M. Wood  
alexis@consumersadvocate.com  
Kas L. Gallucci

kas@consumersadvocate.com  
Law Offices of Ronald A. Marron  
651 Arroyo Drive  
San Diego, CA 92103

**Attorneys for Plaintiff, Nanette Hunter**

Rafey S. Balabanian  
rbalabanian@edelson.com  
Christopher L. Dore  
cdore@edelson.com  
Benjamin H. Richman  
brichman@edelson.com  
Edelson PC  
350 North LaSalle Street, Suite 1300  
Chicago, IL 60654

Marc P. Cook  
cnklawfirm@aol.com  
Bailus Cook & Kelesis, Ltd.  
400 S. 4<sup>th</sup> Street, Suite 300  
Las Vegas, NV 86101

**Attorneys for Plaintiff, Jessica Beell**

Gary J. Lorch  
glorch@gordonrees.com  
Amy Maclear  
amaclear@gordonrees.com  
Gordon & Rees, LLP  
275 Battery Street, Suite 2000  
San Francisco, CA 94111

Issa Kalani Moe  
moei@moss-barnett.com  
Moss & Barnett P.A.  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

Stephanie J. Smith  
sjsmith@gordonrees.com  
Robert E. Schumacher  
rschumacher@gordonrees.com  
Gordon & Rees LLP  
3770 Howard Hughes Parkway, Suite 100  
Las Vegas, NV 89169

James Charles Kezele  
Kevin R. Fezell  
Cors & Bassett LLC  
537 E. Pete Rose Way  
Suite 400  
Cincinnati, Ohio 45202

Rex Garner  
rdg@morrislawgroup.com  
Robert R. McCoy  
rrm@morrislawgroup.com  
Morris Law Group  
900 Bank of America Plaza  
300 S. Fourth Street  
Las Vegas, NV 89101

Joan M. Borzcik  
Gordon & Rees LLP  
101 West Broadway  
Suite 2000  
San Diego, CA 92101

**Attorneys for Defendant First National Collection Bureau, Inc.**

/s/ Todd M. Friedman  
Todd M. Friedman, Esq.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

IN RE: FIRST NATIONAL	:	MDL: 2527
COLLECTION BUREAU, INC	:	
TELEPHONE CONSUMER	:	CASE NO. 2:14-cv-00557-
PROTECTION ACT (TCPA)	:	KJD-CWH (Base File)
LITIGATION	:	
THIS DOCUMENT RELATES TO:	:	ORDER OF DIMISSAL OF
Case No.: 2:13-CV-01206 (Neal v.	:	INDIVIDUAL CLAIMS WITH
First National Collection Bureau, Inc.)	:	PREJUDICE AND CLASS CLAIMS
Case No.: 13-CV-01303 (Beell v.	:	WITHOUT PREJUDICE
First National Collection Bureau, Inc.)	:	
Case No.: 13-cv-1515 (Hunter v.	:	
First National Collection Bureau, Inc.)	:	

---

Pursuant to the Parties’ Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the individual claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.* Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed with prejudice.

Pursuant to the Parties’ Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the putative class claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.* Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed without prejudice.


6/23/2015

---

Judge Kent J. Dawson