

PROSKAUER ROSE LLP
One Newark Center
Newark, NJ 07102-5211
Tel. (973) 274-3200
Fax (973) 274-3299

1 Anthony L. Hall, Esq.
ahall@hollandhart.com
2 Nevada Bar No. 5977
Joseph G. Went, Esq.
3 jgwent@hollandhart.com
Nevada Bar No. 9220
4 HOLLAND & HART LLP
9555 Hillwood Drive, Second Floor
5 Las Vegas, Nevada 89134
Tel. (702) 669-4600
6 Fax (702) 669-4650

7 And

8 Joseph C. O'Keefe, Esq. (*pro hac vice*)
jokeefe@proskauer.com
9 Nicole Eichberger, Esq. (*pro hac vice*)
neichberger@proskauer.com
10 PROSKAUER ROSE LLP
One Newark Center
11 Newark, NJ 07102-5211
Tel. (973) 274-3200
12 Fax (973) 274-3299

13 *Attorneys for Plaintiffs/Counterdefendants*

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 NEW ENGLAND LIFE INSURANCE
COMPANY, METROPOLITAN LIFE
17 INSURANCE COMPANY,
18 Plaintiffs,

19 vs.

20 JIMMY LEE, an individual, JOHN (a/k/a JACK)
EWING, an individual, KARIN METCALF, an
21 individual, WEALTH CONSULTING GROUP,
22 LLC, THE WEALTH CONSULTING GROUP
LLC, and KAIZEN CONSULTANTS, LLC,
23 Defendants.

Case No. 14 CV 01797(JCM)(NJK)
**STIPULATION AND
PROPOSED ORDER TO DISMISS
WITH PREJUDICE**

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Fax (973) 274-3299

JIMMY LEE, an individual, WEALTH
CONSULTING GROUP, LLC; THE WEALTH
CONSULTING GROUP LLC; KAIZEN
CONSULTANTS LLC,

Counterclaimants,

vs.

NEW ENGLAND LIFE INSURANCE
COMPANY, METROPOLITAN LIFE
INSURANCE COMPANY,

Counterdefendants.

Pursuant to Federal Rule of Civil Procedure 41(a)(1) and Local Rule 7-1, Plaintiffs/Counterdefendants New England Life Insurance Company (“NELICO”), and Metropolitan Life Insurance Company (“MetLife”); Defendants/Counterclaimants Jimmy Lee (“Lee”), Wealth Consulting Group, LLC (“WCG”), The Wealth Consulting Group LLC (“TWCG”), and Kaizen Consultants LLC (“Kaizen”) (collectively, the “Lee Parties”); Defendant/Counterclaimant John (a/k/a Jack) Ewing (“Ewing”); and Defendant/Counterclaimant Karin Metcalf (“Metcalf”), through their respective counsel, hereby stipulate and agree that this matter shall be dismissed in its entirety, with prejudice. Each side to bear its own costs and attorneys’ fees.

DATED this 7th day of September, 2016.

Proskauer Rose LLP

By: s/ Joseph C. O’Keefe
Joseph C. O’Keefe, Esq. (*pro hac vice*)
Nicole A. Eichberger, Esq. (*pro hac vice*)
Proskauer Rose LLP
One Newark Center, 18th Floor
Newark, New Jersey 07102
(973) 274-3200

- and -

Anthony L. Hall, Esq.
Nevada Bar No. 5977
Joseph G. Went, Esq.
Nevada Bar No. 9220
Holland & Hart LLP

1 Nevada Bar No. 11066
2 9555 Hillwood Drive, 2nd Floor
3 Las Vegas, Nevada 89134

4 *Attorneys for Plaintiffs/Counterdefendants*
5 *New England Life Insurance Company and*
6 *Metropolitan Life Insurance Company*

7 DATED this 7th day of September, 2016.

8 BAILEY ❖ KENNEDY

9 By: *s/ Joshua M. Dickey*
10 JOHN R. BAILEY
11 JOSHUA M. DICKEY
12 PAUL C. WILLIAMS
13 AMANDA L. STEVENS
14 8984 Spanish Ridge Avenue
15 Las Vegas, Nevada 89148
16 *Attorneys for Defendants/Counterclaimants*
17 *Jimmy Lee; Wealth Consulting Group, LLC;*
18 *The Wealth Consulting Group LLC; and*
19 *Kaizen Consultants LLC*

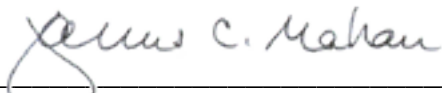
DATED this 7th day of September, 2016.

JAMES KWON, LLC

By: *s/ James W. Kwon*
JAMES W. KWON
5808 Spring Mountain Road
Suite 107
Las Vegas, Nevada 89146
Attorneys for Defendants/Counterclaimants
John aka Jack Ewing and Karin Metcalf

PROSKAUER ROSE LLP
One Newark Center
Newark, NJ 07102-5211
Tel. (973) 274-3200
Fax (973) 274-3299

IT IS SO ORDERED September 8, 2016.


UNITED STATES DISTRICT JUDGE

PROSKAUER ROSE LLP
One Newark Center
Newark, NJ 07102-5211
Tel. (973) 274-3200
Fax (973) 274-3299

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d), I hereby certify that on the 7th day of September, 2016, I served a true and correct copy of the foregoing **STIPULATION OF DISMISSAL WITH PREJUDICE OF CLAIMS AS AGAINST LEE DEFENDANTS, EWING, AND METCALF AND ALL COUNTERCLAIMS AS AGAINST PLAINTIFFS/COUNTERDEFENDANTS** by ECF on all counsel of record.

DATED this 7th day of September, 2016.

PROSKAUER ROSE, LLP

/s/ Joseph C. O'Keefe
Anthony L. Hall, Esq.
Nevada Bar No. 5977
ahall@hollandhart.com
Joseph G. Went, Esq.
Nevada Bar No. 9220
jgwent@hollandhart.com
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

-and-

Joseph C. O'Keefe, Esq. (*pro hac vice*)
jokeefe@proskauer.com
Nicole A. Eichberger, Esq. (*pro hac vice*)
neichberger@proskauer.com
PROSKAUER ROSE LLP
One Newark Center
Newark, NJ 07102-5211

*Attorneys for Plaintiffs/Counterdefendants
New England Life Insurance Company and
Metropolitan Life Insurance Company*