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10 *Attorneys for Plaintiff*

11 UNITED STATES DISTRICT COURT  
 12 DISTRICT OF NEVADA

13 THOMAS W. MCNAMARA, as the Court-  
 Appointed Receiver for Ideal Financial  
 14 Solutions, Inc.; Ascot Crossing, LLC; Chandon  
 Group, Inc.; Bracknell Shore, Ltd.; Fiscal  
 15 Fitness, LLC; Avanix, LLC; Debt Elimination  
 Systems, LLC; US Debt Relief, LLC; Money  
 16 Mastery, LLC; US Debt Assistance Corp.; IWB  
 Services (St. Kitts); Financial Fitness, LLC;  
 17 Debt to Wealth, LLC (St. Kitts); Debt to  
 Wealth, LLC (Nevada); Ideal Goodness, LLC;  
 18 Dollars West, LLC; Fluidity, LLC; Newport  
 Sails, LLC; Shaw Shank, LLC; Bunker Hillside,  
 19 LLC; Funding Guarantee, LLC; Newline Cash,  
 LLC; Wealth Fitness, LLC; Zeal Funding  
 20 Services, LLC; and related subsidiaries and  
 affiliates,

21 Plaintiff,

22 v.

23 VOLTAGE PAY INC., a Canadian corporation  
 doing business as voltagepay.com, Voltage  
 24 Payments, Inc., and Voltage Pay LLC; KEVIN  
 LEWIS; JETY HOLDINGS, a company of  
 25 unknown origins; DAVID SHEHKTER;  
 2170773 ONTARIO LIMITED, a Canadian  
 26 corporation; and ROES 1-10.

27 Defendants.

**Case No. 2:15-cv-02177-JAD-GWF**

**STIPULATED MOTION FOR  
 DISMISSAL WITH PREJUDICE OF  
 DEFENDANTS VOLTAGE PAY INC.,  
 JETY HOLDINGS, KEVIN LEWIS,  
 DAVID SHEHKTER, AND 2170773  
 ONTARIO LIMITED**

Related Case:

*Federal Trade Commission v. Ideal Financial  
 Solutions, Inc. et al.*, District of Nevada, Case  
 No. 2:13-cv-00143-JAD-GWF

ECF No. 97

1 Plaintiff Thomas W. McNamara (the "Receiver" or "Plaintiff") and Defendants Voltage  
2 Pay Inc., Jety Holdings, Kevin Lewis, David Shekhter and 2170773 Ontario Limited  
3 (collectively, "Defendants" and, with Plaintiff, the "Parties") hereby jointly stipulate and move  
4 for an order dismissing all claims against Defendants in this action with prejudice.

5 As specified in the Settlement Agreement between Plaintiff and Defendants, the Court  
6 will retain jurisdiction over the Parties to enforce the Settlement Agreement and Mutual Release  
7 of Claims executed by the Parties.

8 The Parties shall bear their own costs and fees except as expressly provided in the  
9 Settlement Agreement and Mutual Release of Claims executed by the Parties.

10 IT IS SO STIPULATED.

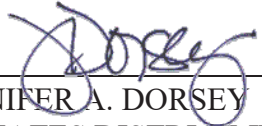
11 Dated: December 4, 2017  
12 By: /s/ Edward Chang  
13 Edward Chang  
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20 Attorneys for Plaintiff

Dated: December 4, 2017  
By: /s/ David P. Steiner  
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Attorneys for Defendants

**ORDER**

IT IS SO ORDERED:

21 DATED: 12-8-17

  
\_\_\_\_\_  
HON. JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE