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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 EDD H. AHRENS, an individual,
 12 Plaintiff,

13 v.

14 RASHAD RATLIFF, an individual; PERFECT
 15 PRIVACY, LLC, a limited-liability company;
 16 WEB.COM GROUP, INC., a Delaware
 17 corporation; UPLEA S.A.R.L., a company
 organized under French law; DSTORAGE
 18 S.A.S.U., a company organized under French
 law; JOHANN THIESSON, an individual; and
 YOHAN TORDJMAN, an individual,

19 Defendants.

Case No.: 2:16-cv-1114

**JOINT MOTION TO DISMISS
 COMPLAINT WITHOUT PREJUDICE
 AS TO RASHAD RATLIFF AND ORDER
 THEREON**

20 Plaintiff Edd H. Ahrens (“Plaintiff”), by and through his counsel, GIBSON LOWRY LLP,
 21 and Defendant Rashad Ratliff (“Mr. Ratliff”), in proper person, hereby move that the Complaint
 22 filed by Plaintiff Edd H. Ahrens **as to Mr. Ratliff only**, shall be dismissed without prejudice,
 23 with the respective parties to bear their own costs and attorney’s fees, in accordance with the
 24 agreement entered into between Plaintiff and Mr. Ratliff on or about June 14, 2016 (the
 25 “Settlement Agreement”).

26 Plaintiff and Mr. Ratliff stipulate that the United States District Court for the District of
 27 Nevada shall retain jurisdiction to enforce the Settlement Agreement in the event that Ratliff
 28 breaches this Agreement or defaults on any of Mr. Ratliff’s obligations in any manner, and that

1 this Court shall retain jurisdiction with respect to the case-in-chief to vacate the Dismissal, allow
2 Ahrens to reinvigorate Ahrens' claims against Mr. Ratliff as if the Dismissal never occurred, and
3 allow Ahrens to sue Mr. Ratliff for breach and/or default of this Agreement, with Mr. Ratliff
4 hereby waiving any statute of limitations and/or jurisdictional defense of any nature.

5
6 Dated this 13th day of July, 2016.

Dated this 13th day of July, 2016.

7
8 GIBSON LOWRY LLP

RASHAD RATLIFF

9 /s/ J.D. Lowry.

/s/ Rashad Ratliff

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17 Mr. Rashad Ratliff
18 2636 Oakmere Drive
19 Harvey, Louisiana 70058
20 Defendant In Proper Person

21 The parties having so moved, and good cause appearing,

22 **IT IS SO ORDERED:**

23 

24 RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE

26 DATED: March 6, 2017

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of GIBSON LOWRY LLP and that on this 13th day of July, 2016, I caused a correct copy of the foregoing **JOINT MOTION TO DISMISS COMPLAINT WITHOUT PREJUDICE AS TO RASHAD RATLIFF AND ORDER THEREON** to be served via CM/ECF to:

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/s/ David White
An employee of GIBSON LOWRY LLP