

1 David H. Krieger, Esq.  
2 Nevada Bar No. 9086  
3 Shawn W. Miller, Esq.  
4 Nevada Bar No. 7825  
5 KRIEGER LAW GROUP, LLC  
6 2850 W. Horizon Ridge Pkwy, Suite 200  
7 Henderson, Nevada 89052  
8 Phone: (702) 848-3855  
9 dkrieger@kriegerlawgroup.com  
10 smiller@kriegerlawgroup.com

11 *Attorneys for Plaintiff,*  
12 *William Berry, Jr.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 WILLIAM BERRY, JR,

16 Plaintiff,

17 vs.

18 AARGON AGENCY, INC; PLUSFOUR, INC;  
19 QUANTUM COLLECTIONS; AND  
20 RICHLAND HOLDINGS, INC DBA  
21 ACCOUNTCORP OF SOUTHERN NEVADA,

22 Defendants.

23 Case No.: 2:20-cv-02144-APG-EJY

24 **JOINT MOTION FOR DISMISSAL OF  
25 ALL CLAIMS AGAINST DEFENDANT  
26 RICHLAND HOLDINGS, INC. DBA  
27 ACCTCORP OF SOUTHERN NEVADA,  
28 WITH PREJUDICE**

29 WILLIAM BERRY, JR (“Plaintiff”) and Defendant RICHLAND HOLDING INC., DBA  
30 ACCTCORP OF SOUTHERN NEVADA, erroneously named as RICHLAND HOLDING INC., DBA  
31 ACCOUNTCORP OF SOUTHERN NEVADA (“Richland”), collectively the “Parties,” by and through  
32 their counsel of record, hereby stipulate and agree that all Plaintiff’s claims against Richland in this action  
33 shall be dismissed with prejudice pursuant to Fed. R. Civ. P. 41(a)(2), each Party to bear its own  
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1 attorney's fees, costs and expenses. Accordingly, Plaintiff and Richland here by jointly submit this  
2 motion ("Joint Motion") requesting that the Court enter an order of dismissal, dismissing Plaintiff's  
3 claims against Defendant Richland, with prejudice.

4 STIPULATED, AGREED AND SUBMITTED on February 18, 2021.  
5

6 /s/ Shawn W. Miller

7 David H. Krieger, Esq.  
Shawn W. Miller, Esq.  
8 KRIEGER LAW GROUP, LLC  
2850 W. Horizon Ridge Pkwy., Suite 200  
9 Henderson, Nevada 89052  
10 *Attorneys for Plaintiff*

/s/ Jared M. Moser

Jared M. Moser, Esq.  
Chad F. Clement, Esq.  
11 MARQUIS AURBACH COFFING  
10001 Park Run Drive  
12 Las Vegas, Nevada 89145  
13 *Attorneys for Defendant Richland*

14 **ORDER OF DISMISSAL**

15 IT IS HEREBY ORDERED that Plaintiff's claims against Defendant RICHLAND HOLDING  
16 INC., DBA ACCTCORP OF SOUTHERN NEVADA are hereby dismissed with prejudice, each party  
17 to bear its own attorney's fees, costs and expenses.



18 UNITED STATES DISTRICT JUDGE

19 Dated: February 18, 2021