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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SIMPLE PUMP CO., LLC, a Nevada limited liability company.

Plaintiff,

vs.

PETER DUGAN, a California resident,

Defendant.

Case No.: 3:16-cv-00189-HDM-WGC

**ORDER GRANTING
STIPULATION TO DISMISS WITH
PREJUDICE AND [PROPOSED] ORDER**

AND CROSS ACTION

This stipulation is entered into and offered by Plaintiff/Cross-Defendant Simple Pump Co., LLC and Defendant/Cross-Plaintiff Peter Dugan and requests that the entire action be dismissed with prejudice based upon the following facts:

1. Nevada District Court Case No. 16-CV-0057 was commenced in Douglas County on March 14, 2016 by Simple Pump against Peter Dugan.
2. Dugan removed the action to Federal Court as Case No. 3:16-cv-00189-HDM-WCG, generally denied the material allegations of the Simple Pump Complaint, and filed a Cross-Complaint.
3. The parties, having resolved their disputes, now desire to dismiss the entire action with prejudice with each side to bear its own attorneys' fees and costs.
4. Upon application by either party, the Court may reopen the matter solely to enforce the terms of the settlement agreement, or to enter judgment pursuant to the terms of the

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settlement agreement. Therefore,

IT IS STIPULATED, by and between Simple Pump, Co., LLC and Peter Dugan, that Case No. 3:16-cv-00189-HDM-WCG is dismissed in its entirety, with each party to bear its own attorneys' fees and costs. Upon application by either party, the Court may reopen the matter solely to enforce the terms of the settlement agreement, or to enter judgment pursuant to the terms of the settlement agreement.

DATED: July 25, 2017

DATED: July 25, 2017

FORTIS LLP

McDONALD CARANO WILSON LLP

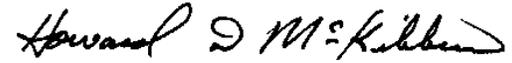
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*Attorneys for Plaintiff/Counterdefendant
Simple Pump Co., LLC*

* * *

IT IS SO ORDERED



UNITED STATES DISTRICT JUDGE

Dated: July 25, 2017