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6 *Attorneys for Plaintiff/Counter-defendant  
 and Counter-defendants*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 MFR HOLDCO, LLC, a foreign limited  
 liability company,  
 11  
 Plaintiff,

12 v.

13 ICON RENO PROPERTY OWNER POOL 3  
 NEVADA, LLC, a foreign limited liability  
 14 company,  
 15 Defendant.

Case No. 3:18-cv-00034-MMD-WGC

**STIPULATION AND ORDER TO  
 DISMISS WITH PREJUDICE**

16 ICON RENO PROPERTY OWNER POOL 3  
 NEVADA, LLC, a foreign limited liability  
 17 Company,  
 18 Counter-claimant.

19 v.

20 MFR HOLDCO, LLC; ACH FOAM  
 TECHNOLOGIES, INC.; FRANK  
 21 KIESECKER, JR., individually; RICHARD L.  
 WALLER, individually; MICHAEL S.  
 22 HUEMPFNER, individually,  
 23 Counter-defendants.

24  
 25 Plaintiff/Counter-Defendant, MFR Holdco, LLC, Counter-Defendant ACH Foam  
 26 Technologies, Inc., Counter-Defendant, Michael S. Huempfner, Counter-Defendant, Richard L.  
 27 Waller, and Counter-Defendant, Frank Kiesecker, by and through their undersigned counsel of  
 28 record, and Defendant/Counter-Claimant, ICON Reno Property Owner Pool 3 Nevada, LLC, by

HOLLAND & HART LLP  
 5441 Kietzke Lane, Second Floor  
 Reno, NV 89511

1 and through its undersigned counsel of record, hereby stipulate and agree that Plaintiff's First  
2 Amended Complaint, Counter-Claimant's Counterclaim, and any and all claims or  
3 counterclaims whatsoever shall be dismissed in their entirety with prejudice (subject to the  
4 terms of the Settlement Agreement and Mutual Releases executed by the parties), and with each  
5 of the above parties bearing their own attorneys' fees and costs that are related to or arising  
6 from this action.

7 DATED this 16th day of July 2019.

8 /s/ Matthew B. Hippler  
9 Matthew B. Hippler (SBN 7015)  
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Holdco, LLC, Counter-Defendant ACH Foam  
Technologies, Inc., Counter-Defendant, Michael S.  
Huempfer, Counter-Defendant, Richard L. Waller,  
Counter-Defendant, Frank Kiesecker*

16 DATED this 16th day of July 2019.

17 /s/ Kirk C. Johnson  
18 Kirk C. Johnson (SBN 4299)  
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*Attorneys for Defendant/Counter-Claimant, ICON  
Reno Property Owner Pool 3 Nevada, LLC*

25 **ORDER**

26 **IT IS SO ORDERED.**

27   
28 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

DATED: July 16, 2019