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

10 UNITED STATES OF AMERICA FOR THE
 11 USE AND BENEFIT OF Q.M.E. GUNITE,
 INC., a California corporation,

12 Plaintiff,

13 v.

14 CENTRAL ENVIRONMENTAL, INC., an
 15 Alaska corporation; and LIBERTY MUTUAL
 16 INSURANCE COMPANY, a Massachusetts
 corporation,

17 Defendants.

Case No. 3:24-cv-00230-CSD

**STIPULATION TO DISMISS WITH
 PREJUDICE AND ORDER**

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 19 Plaintiff United States of America For The Use And Benefit of Q.M.E. Gunite, Inc., a
 20 California corporation (“Plaintiff”), and Defendants Central Environmental, Inc., an Alaska
 21 corporation, and Liberty Mutual Insurance Company, a Massachusetts corporation (“Defendants”),
 22 through their respective undersigned counsel, hereby represent they have entered into a confidential
 23 settlement of the above-captioned matter, and stipulate and agree as follows:

24 1. All of the claims and causes of action asserted, or that could have been asserted, by
 25 Plaintiff against Defendants, including its related persons, entities, companies (as managers,
 26 owners, shareholders, and/or members) and successors-in-interest, in this litigation may be, and
 27 hereby are, dismissed with prejudice, with each party to bear its own attorneys’ fees and costs
 28 incurred in the litigation and settlement of this matter.

1 2. All counterclaims and causes of action asserted, or that could have been asserted,
2 by Defendants against Plaintiff, including its related persons, entities, companies (as managers,
3 owners, shareholders, and/or members), and successors-in-interest, in this litigation may be, and
4 hereby are, dismissed with prejudice, with each party to bear its own attorneys' fees and costs
5 incurred in the litigation and settlement of this matter.

6 Dated this 27th day of January, 2025
7 LANAK & HANNA, P.C.

Dated this 27th day of January, 2025
McDONALD CARANO LLP

9 By: /s/ David R. Johnson
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14 *Attorneys for United States of America For
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*Attorneys for Central Environmental, Inc. and
Liberty Mutual Insurance Company*

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: January 28, 2025