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8 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 SOARING HELMET CORPORATION, a
10 Washington Corporation,

Case No. C09-0789 -JLR

11 Plaintiff,

STIPULATION AND ORDER FOR
DISMISSAL

12 v.

13 NANAL, INC., a Nevada corporation, d/b/a
14 LEATHERUP.COM,

15 Defendant.

16
17 **STIPULATION**

18 The parties have entered into a Settlement Agreement (“Agreement”). Consistent
19 with the terms of the Agreement and pursuant to Federal Rule of Civil Procedure 41(a)(1),
20 the parties stipulate to dismissal of this action with prejudice with no award of costs,
expenses or attorney’s fee to any party.

21 This Court will retain jurisdiction of the case only to enforce the Agreement,
22 including the relief provided therein for breach of the Agreement. Prior to filing any
23 motion or claim for breach, the party claiming breach will communicate with the other

{95264.DOC}

STIPULATION AND ORDER FOR DISMISSAL – 1

3249.071 he210602

(AB) 1
INVICTA LAW GROUP, PLLC

1000 SECOND AVENUE, SUITE 3310

SEATTLE, WA 98104-1019

FAX (206) 903-6365

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1 party's attorneys, and the allegedly breaching party will have 30 calendar days to cure any
2 alleged breach. The case is otherwise dismissed in its entirety with prejudice, each party
3 to bear its own attorneys' fees and costs.

4 //

5 //

6 RESPECTFULLY SUBMITTED this 21st day of January, 2011.

7 INVICTA LAW GROUP, PLLC

8
9 By: /s/ Stacie Foster
10 Stacie Foster, WSBA NO. 23397
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12 Seattle, WA 98104
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16 Attorneys for Plaintiff SOARING HELMET CORPORATION

17 HENDRICKS & LEWIS PLLC

18 By: /s/ Katherine Hendricks
19 Katherine Hendricks, WSBA No. 14040
20 901 Fifth Avenue, Suite 4100
21 Seattle, WA 98164
22 Telephone: (206) 624-1933
23 Fax: (206) 583-2716
Email: kh@hllaw.com
Attorneys for Defendant Nanal, Inc.

ORDER

IT IS SO ORDERED.

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STIPULATION AND ORDER FOR DISMISSAL - 2

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DATED: _____, 2011.

THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT COURT JUDGE

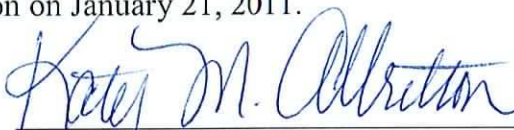
(AB) 3

1 CERTIFICATE OF SERVICE

2 I hereby certify that I electronically filed the foregoing with the Clerk of the Court
3 using the CM/ECF system which will send notification of such filing to the following
4 persons/attorneys of record:
5

6 Ms. Katherine Hendricks
7 Ms. Stacia N. Lay
8 HENDRICKS & LEWIS, PLLC
9 901 Fifth Avenue, Suite 4100
10 Seattle, WA 98164

11 EXECUTED at Seattle, Washington on January 21, 2011.

12 

13 Katy M. Albritton
14 Legal Assistant
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