

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SOARING HELMET CORPORATION, a
Washington Corporation,

Plaintiff,

v.

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

Defendant.

Case No. C09-0789 -JLR

STIPULATION AND ORDER FOR
DISMISSAL

STIPULATION

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

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

(AB) 1

{95264.DOC}

STIPULATION AND ORDER FOR DISMISSAL – 1

3249.071 he210602

INVICTA LAW GROUP, PLLC

1000 SECOND AVENUE, SUITE 3310

SEATTLE, WA 98104-1019

FAX (206) 903-6365

TEL (206) 903-6364

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 By: /s/ Stacie Foster

9 Stacie Foster, WSBA NO. 23397

10 1000 2nd Avenue, Suite 3310

11 Seattle, WA 98104

12 Telephone: (206) 903-6364

13 Fax: (206) 903-6365

14 E-Mail: sfoster@invictalaw.com

15 Attorneys for Plaintiff SOARING HELMET CORPORATION

16 HENDRICKS & LEWIS PLLC

17 By: /s/ Katherine Hendricks

18 Katherine Hendricks, WSBA No. 14040

19 901 Fifth Avenue, Suite 4100

20 Seattle, WA 98164

21 Telephone: (206) 624-1933

22 Fax: (206) 583-2716

23 Email: kh@hllaw.com

Attorneys for Defendant Nanal, Inc.

ORDER

IT IS SO ORDERED.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

DATED: _____, 2011.

THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT COURT JUDGE

(AB) 3

