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2 **THE HONORABLE BARBARA J. ROTHSTEIN**

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8 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 In the Matter of the Complaint of Sea Beast LLC  
11 as owner of SEA BEAST (NO. 560484),  
12 Petitioning for Exoneration from or Limitation of  
13 Liability

IN ADMIRALTY

No.: 2:15-cv-01717-BJR

14 **STIPULATED MOTION AND ORDER  
15 OF DISMISSAL WITHOUT  
16 PREJUDICE**

**NOTE ON MOTION CALENDAR:**

**April 07, 2017**

17 Petitioner Sea Beast LLC and sole Claimant Michelle Martin jointly move this Court for  
18 an order dismissing this action without, subject to the stipulation set forth below.

19 Claimant Michelle Martin stipulates as follows:

20 1. Michelle Martin has sought the voluntary dismissal of the action styled  
21 Michelle Martin v. Sea Beast, LLC, Case No. 15-2-06123-1, currently pending in Snohomish  
22 County Superior Court.

23 2. In the event dismissal is not granted in Snohomish County Superior Court or  
24 Ms. Martin reasserts her claims against SEA BEAST LLC in any future proceeding, Ms. Martin  
25 agrees that SEA BEAST LLC may petition for exoneration from or limitation of liability pursuant  
26 to 46 U.S.C. §§ 30501 *et seq.* and Rule F of the Federal Rules of Civil Procedure Supplemental

1 Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and such petition will be  
2 considered to have been timely filed in accordance with the provisions of  
3 Rule F(1).

4 DATED this 7th day of April, 2017.

5 NICOLL BLACK & FEIG PLLC

6 ANDERSON & MITCHELL

*Per E-Mail Authority*

7 /s/ Jeremy B. Jones

8 /s/ Robert Anderson

9 Chris P. Reilly, WSBA No. 25585

Robert Anderson, WSBA No. 27076

10 Jeremy B. Jones, WSBA No. 44138

100 King Street, Suite 560

11 1325 Fourth Avenue, Suite 1650

Seattle, WA 98104

12 Seattle, WA 9801

(206) 436-8490

13 (206) 838-7555

14 *Attorneys for Petitioner*

15 *Attorneys for Claimant Michelle Martin*

1 **ORDER**

2 Pursuant to the stipulation of the parties, IT IS ORDERED that this action and all claims  
3 asserted herein are DISMISSED without prejudice and without costs to any party.

4 DATED this \_10th\_ day of \_\_April\_\_, 2017.

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8 Barbara Jacobs Rothstein  
9 U.S. District Court Judge

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15 PRESENTED BY:

16 NICOLL BLACK & FEIG, PLLC

17  
18 s/ Jeremy B. Jones

19 Chris P. Reilly, WSBA No. 25585  
20 Jeremy B. Jones, WSBA No. 44138  
21 1325 Fourth Avenue, Suite 1650  
22 Seattle, WA 9801  
23 (206) 838-7555  
24 Attorneys for Petitioner  
25  
26

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date set forth below, I electronically filed the foregoing with  
3 the Clerk of the Court using the CM/CF system which will send notification of such filing to the  
4 following:

5 Robert Anderson, WSBA No. 27076  
6 Anderson & Mitchell  
7 100 King Street, Suite 560  
8 Seattle, WA 98104  
9 Telephone: 206-436-8490  
10 Fax: 206-436-8491  
11 Email: [ba@andersonmitchell.com](mailto:ba@andersonmitchell.com)  
12 *Attorneys for Claimant Michelle Martin*

- VIA HAND DELIVERY
- VIA FACSIMILE
- VIA U.S. MAIL
- VIA E-MAIL
- VIA OVERNIGHT COURIER
- VIA CM/ECF

13 DATED this 7th day of April, 2017.

14 NICOLL BLACK & FEIG, PLLC

15 /s/ Jeremy B. Jones  
16 Jeremy B. Jones, WSBA No. 44138