

THE HONORABLE RICARDO S. MARTINEZ

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHI CHEN, et al.,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION;
QUARTZBURG GOLD, LP; ISR
CAPITAL, LLC; IDAHO STATE
REGIONAL CENTER, LLC; and SIMA
MUROFF,

Defendants.

No. 2:16-cv-01109-RSM

(Consolidated with No. 2:16-cv-01113-RSM)

**STIPULATED MOTION AND ORDER
OF DISMISSAL WITH PREJUDICE OF
ALL CLAIMS AGAINST U.S. BANK BY
FAN ZHEN, LI XIANKUN, LUO
CHENG, AND SUN LIPING**

NOTE ON MOTION CALENDAR:
September 10, 2020

1 **STIPULATION**

2 Pursuant to FRCP 41, Plaintiffs FAN ZHEN, LI XIANKUN, LUO CHENG, and SUN
3 LIPING (collectively, the “Identified Plaintiffs”) and Defendant U.S. Bank National Association
4 (“U.S. Bank”), by and through their undersigned counsel of record, hereby stipulate and agree that
5 all claims and causes of action by the Identified Plaintiffs against U.S. Bank in this action shall be
6 dismissed with prejudice, and without fees or costs to any party. For clarity, no claims by the
7 Identified Plaintiffs against parties other than U.S. Bank, and no claims by any Plaintiffs other than
8 the Identified Plaintiffs, are affected by this Stipulation. The Identified Plaintiffs and Defendant
9 U.S. Bank jointly request entry of the Order below.

10 SO STIPULATED this 10th day of September 2020.

11
12 /s/ Shawn Larsen-Bright

13 Jeremy Larson, WSBA #22125
14 Shawn Larsen-Bright, WSBA #37066
15 701 Fifth Avenue, Suite 6100
16 Seattle, WA 98104-7043
17 Tel: (206) 903-8800
18 larson.jake@dorsey.com
19 larsen.bright.shawn@dorsey.com

20 *Attorneys for U.S. Bank National Association*

21 /s/ John McDonald

22 Jihee Ahn, WSBA #56012
23 John McDonald *admitted pro hac vice*
24 Harris Bricken Sliwoski LLP
25 600 Stewart Street, Suite 1200
26 Seattle, WA 98101
27 Tel: (206) 224-5657
jihee@harrisbricken.com
john.mcdonald@harrisbricken.com

Attorneys for Plaintiffs

1 **ORDER**

2 Based upon FRCP 41 and the foregoing Stipulation, all claims and causes of action by
3 Plaintiffs FAN ZHEN, LI XIANKUN, LUO CHENG, and SUN LIPING (collectively, the
4 “Identified Plaintiffs”) against U.S. Bank National Association in this action shall be and are
5 hereby dismissed with prejudice, and without fees or costs to any party. No claims by the
6 Identified Plaintiffs against parties other than U.S. Bank National Association, and no claims by
7 any Plaintiffs other than the Identified Plaintiffs, are affected by this Order.

8 IT IS SO ORDERED this 11th day of September, 2020.

9
10 

11 RICARDO S. MARTINEZ
12 CHIEF UNITED STATES DISTRICT JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I caused to be served the foregoing on the following counsel of
3 record by the method indicated:

4 Daniel P. Harris, WSBA #16778
5 Jihee Ahn, *admitted pro hac vice*
6 John McDonald, *admitted pro hac vice*
7 Harris Bricken
8 600 Stewart Street, Suite 1200
9 Seattle, WA 98101

- Via Messenger
- Via Facsimile
- Via U.S. Mail
- Via Electronic Mail (*per agreement*)
- Via ECF Notification

10 dan@harrisbricken.com
11 jihee@harrisbricken.com
12 john.mcdonald@harrisbricken.com

13 ***Attorneys for Plaintiffs***

14 Sima Muroff
15 623 West Hays St.
16 Boise, ID 83702

- Via Messenger
- Via Facsimile
- Via U.S. Mail
- Via Electronic Mail (*per agreement*)
- Via ECF Notification

17 ***Pro Se***

18 Sean T. Prosser, *admitted pro hac vice*
19 Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
20 3580 Carmel Mountain Road, Suite 300
21 San Diego, CA 92130
22 STProsser@mintz.com

- Via Messenger
- Via Facsimile
- Via U.S. Mail
- Via Electronic Mail (*per agreement*)
- Via ECF Notification

23 *and*

24 Roger D. Mellem, WSBA #14917
25 Adam Doupe, WSBA #55483
26 Ryan, Swanson & Cleveland, PLLC
27 1201 Third Avenue, Suite 3400
Seattle, Washington 98101-3034
mellem@ryanlaw.com
doupe@ryanlaw.com

- Via Messenger
- Via Facsimile
- Via U.S. Mail
- Via Electronic Mail (*per agreement*)
- Via ECF Notification

***Attorneys for Defendants Quartzburg Gold, LP,
ISR Capital LLC and Idaho State Regional
Center, LLC***

DATED this 10th day of September, 2020.

/s/ Molly Price
Molly Price, Legal Assistant