Case 2:16-cv-01109-RSM Document 373 Filed 12/18/20 Page 1 of 5 2 The Honorable Ricardo S. Martinez 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 AT SEATTLE CHI CHEN, ET AL., Case No. 2:16-cv-01109-RSM 8 Plaintiffs. (Consolidated with No. 2:16-cv-01113-RSM) 9 VS. STIPULATION OF DISMISSAL OF 10 PLAINTIFFS' CLAIMS AGAINST U.S. BANK, NATIONAL ASSOCIATION, QUARTZBURG GOLD, LP; ISR CAPITAL, 11 ET AL., LLC; AND IDAHO STATE REGIONAL CENTER, LLC 12 Defendants. 13 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD: 14 IT IS HEREBY STIPULATED by and between Plaintiffs Xiaobo Chen, Bingxin Fan, 15 Wenlan Huang, Jiaping Jiang, Chenmin Li, Ming Li, Tieyin Li, Zhongfa Liu, Rui Mao, Yunfeng 16 Qing, Yao Song, Hailan Tang, Ling Tang, Ruiping Tao, Xiaolin Yin, Yijun Yin, Zhihong Zhang, 17 Qiang Zhao ("Plaintiffs") and Defendants Quartzburg Gold, LP, ISR Capital, LLC, and Idaho 18 State Regional Center, LLC (the "Quartzburg Defendants"), through their respective counsel, 19 that Plaintiffs' claims against the Quartzburg Defendants may be dismissed without prejudice 20 and without an award of attorney's fees or costs pursuant to Federal Rule of Civil Procedure 21 41(a)(1)(A). Accordingly, Plaintiffs and the Quartzburg Defendants respectfully request that 22 the Court enter the attached Order of Dismissal. 23 IT IS SO STIPULATED. 24 DATED this 14th day of December 2020. 25 26 RYAN, SWANSON & CLEVELAND, STIPULATION OF DISMISSAL OF PLAINTIFFS' PLLC 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 | (206) 654-2234 CLAIMS AGAINST QUARTZBURG GOLD, LP, ISR CAPITAL, LLC, AND IDAHO STATE REGIONAL CENTER, LLC - Page 1 2:16-CV-01109-RSM

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MCNAUL EBEL NAWROT & HELGREN, **PLLC** 3 /s/ Daniel M. Weiskopf Daniel M. Weiskopf (WSBA No. 44941) Ai-Li Chiong-Martinson (WSBA No. 53359) 600 University Street, Suite 2700 Seattle, WA 98101 6 (206) 467-1816 Phone dweiskopf@mcnaul.com achiongmartinson@mcnaul.com Attorneys for Plaintiffs Yin Yijun, Li Tieyin, Mao Rui, Zhang Zhihong, Liu Zhongfa, Qing Yunfeng, 9 Chen Xiaobo, Tao Ruiping, Tang Hailan, Tang 10 Ling, Zhao Qiang, Li Chenmin, Song Yao, Jiang Jiaping, Li Ming, Huang Min, Fan Bingxin, and Yin 11 Xiaolin 12 MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, P.C. 13 /s/ Sean T. Prosser 14 15 Sean T. Prosser (pro hac vice) 16 3580 Carmel Mountain Road, Suite 300 San Diego, CA 92130 17 (858) 314-2152 Phone stprosser@mintz.com 18 RYAN, SWANSON & CLEVELAND, PLLC 19 20 /s/ Roger D. Mellem Roger D. Mellem 21 1201 Third Avenue, Suite 3400 Seattle, WA 98101-3034 22 (206) 654-2234 Phone mellem@ryanlaw.com 23 24 Attorneys for Defendants Quartzburg Gold, LP, ISR Capital LLC, and Idaho State Regional Center, LLC 25 26 RYAN, SWANSON & CLEVELAND, STIPULATION OF DISMISSAL OF PLAINTIFFS' PLLC CLAIMS AGAINST QUARTZBURG GOLD, LP, ISR 1201 THIRD AVENUE, SUITE 3400 CAPITAL, LLC, AND IDAHO STATE REGIONAL SEATTLE, WA 98101 | (206) 654-2234 CENTER, LLC – Page 2 2:16-CV-01109-RSM

ORDER OF DISMISSAL 2 THIS MATTER having come on before the Court on the foregoing Stipulation, and the Court being fully advised in the premise; 4 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that claims of Plaintiffs Xiaobo Chen, Bingxin Fan, Wenlan Huang, Jiaping Jiang, Chenmin Li, Ming Li, Tieyin Li, Zhongfa Liu, Rui Mao, Yunfeng Qing, Yao Song, Hailan Tang, Ling Tang, Ruiping Tao, Xiaolin Yin, Yijun Yin, Zhihong Zhang, Qiang Zhao against Defendants Quartzburg Gold, LP, ISR Capital, LLC, and Idaho State Regional Center, LLC are dismissed without prejudice and without an award of attorneys' fees or costs to either party. 9 10 DATED: December 18, 2020. 11 12 13 RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE 14 15 Presented by: 16 MCNAUL EBEL NAWROT & HELGREN, **PLLC** 17 18 /s/ Daniel M. Weiskopf Daniel M. Weiskopf (WSBA No. 44941) 19 Ai-Li Chiong-Martinson (WSBA No. 53359) 600 University Street, Suite 2700 20 Seattle, WA 98101 21 (206) 467-1816 Phone dweiskopf@mcnaul.com 22 achiongmartinson@mcnaul.com 23 Attorneys for Plaintiffs Yin Yijun, Li Tieyin, Mao Rui, Zhang Zhihong, Liu Zhongfa, Qing Yunfeng, 24 Chen Xiaobo, Tao Ruiping, Tang Hailan, Tang 25 Ling, Zhao Qiang, Li Chenmin, Song Yao, Jiang 26 RYAN, SWANSON & CLEVELAND, STIPULATION OF DISMISSAL OF PLAINTIFFS' PLLC 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 | (206) 654-2234 CLAIMS AGAINST QUARTZBURG GOLD, LP, ISR CAPITAL, LLC, AND IDAHO STATE REGIONAL

CENTER, LLC – Page 3 2:16-CV-01109-RSM

Jiaping, Li Ming, Huang Min, Fan Bingxin, and Yin Xiaolin

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STIPULATION OF DISMISSAL OF PLAINTIFFS' CLAIMS AGAINST QUARTZBURG GOLD, LP, ISR CAPITAL, LLC, AND IDAHO STATE REGIONAL CENTER, LLC – Page 4 2:16-CV-01109-RSM RYAN, SWANSON & CLEVELAND, PLLC 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 | (206) 654-2234 106334673v.1

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on December 15, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all CM/ECF registered users. Also on December 15, 2020, said document was deposited, postage fully paid, with the U.S. Postal Service on the same day in the ordinary course of business as follows:

Sima Muroff (*Pro se* defendant) 623 West Hays St. Boise, ID 83702

> /s/ Roger D. Mellem Roger D. Mellem

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