



2019, Counter-Plaintiffs filed Amended Counterclaims also seeking a declaratory judgment and alleging various causes of action sounding in tort and contract. Dkt. No. 22. Having entered into a settlement agreement on July 30, 2019 (the “Agreement”), the Parties respectfully request that the Court dismiss all claims and counterclaims in this action, in their entirety, without prejudice. The Parties likewise respectfully request that the Court retain exclusive jurisdiction over the Parties for purposes of enforcing the Agreement.

Plaintiffs and Counter-Plaintiffs agree that all claims and counterclaims should be dismissed without prejudice.

**PRAYER FOR RELIEF**

Pursuant to Rule 41 of the Federal Rules of Civil Procedure and this Court’s equitable powers, the Parties respectfully request that the Court grant this motion and dismiss all claims in the Amended Complaint (Dkt. 15) and the Amended Counterclaims (Dkt. 22) without prejudice, pursuant to their settlement agreement entered into on July 30, 2019. The Parties further request that this Court retain exclusive jurisdiction to enforce the settlement agreement in the event such enforcement becomes necessary. Each party to bear its own costs as incurred.

DATED: July 30, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

In accordance with Rule 5 of the Federal Rules of Civil Procedure, the undersigned hereby certifies that on July 30, 2019, I caused a true and correct copy of the foregoing document to be served electronically via the Court's CM/ECF system on the following parties:

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