

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

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|--------------------------------|---|--------------------------------|
| SEALED PLAINTIFF 1 and |) | |
| SEALED PLAINTIFF 2, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Civil Action No. 3:22-cv-00670 |
| |) | |
| PATRIOT FRONT, <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE
FOR SETTLING DEFENDANTS

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants Nathan Noyce, Thomas Dail, Paul Gancarz, Daniel Turechi and Aedan Tredinnick (collectively, the “Settling Defendants), by and through their undersigned counsel, hereby stipulate that all claims asserted against the Settling Defendants, and all their asserted defenses, are dismissed with prejudice. This stipulation of dismissal does not affect Plaintiffs’ claims against the remaining defendants, the settlement agreement between Plaintiffs and the Settling Defendants expressly providing that it does not release those claims.

Pursuant to *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), this stipulation of dismissal explicitly reserves jurisdiction in this Court to enforce the terms of the settlement agreement between Plaintiffs and the Settling Defendants. Plaintiffs and the Settling Defendants agree that the Court retains jurisdiction and authority to enforce, and resolve any disputes concerning, their settlement agreement, as more fully described in the settlement agreement.

Dated: December 3, 2024

Respectfully submitted,

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