

4. The Parties have reached agreement on ~~sterna~~ private settlement agreement, a copy of which is attached to this motion as ~~Exh A~~, and is incorporated herein by reference.

5. The Parties agree that the attached ~~private~~ settlement agreement will fully resolve their dispute.

6. The Parties request that ~~the~~ Court dismiss the lawsuit without prejudice pursuant to Rule 41(a)(1)(B)(ii) of the Federal Rules of Civil Procedure, but ~~condition~~ on this request on the Court's agreement to enter an order retaining ~~its~~ jurisdiction for five years to enforce the private settlement agreement, as authorized by

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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notice to counsel of record for the parties.

/s/ Samuel Brooke