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1	Plaintiff Liberty Media Holdings, LLC and Defendant Youngtek Solutions Ltd.			
2	(collectively "the Parties") have reached a settlement of all claims including the pending			
3	litigation between them.			
4	Pursuant to the Parties' settlement agreement and Federal Rules of Civil Procedure 41(a),			
5				
6	the Parties hereby stipulate to the dismissal without prejudice of the Complaint in this action,			
7	Case No. 10-CV-1972-JHA-(POR), as follows:			
8	1. The Complaint including all claims therein pending against Youngtek Solu	tions		
9	Ltd., d/b/a Tnaflix.com and "Frank" in the above-captioned action, Case No. 10-CV-1972	-JHA-		
	(POR), shall be dismissed without prejudice as to these defendants only;			
10	2. Each of the Parties will bear her/its own attorneys' fees, costs, and other ex	penses		
11	incurred in the above-captioned action.			
12	2 3. The case shall continue with respect to the other Defendants in the action.			
13	3			
14	4 Respectfully submitted,			
15	5 Dated: February 3, 2011 Marc J. Randazza, Esq., SBN 269535			
16	6 RANDAZZA LEGAL GROUP			
17				
18	8 /s/ Marc J. Randazza 3969 4 th Avenue, Suite 204			
19	San Diego, CA 92103			
20	(888) 00/-1113 (205) 427 7662 for			
	mjr@randazza.com	шс		
21	February 3, 2011	ζs, LLC		
22	CROSS LAW GROUP			
23	OLEG CROSS (SB# 246680)			
24	/s/ <u>Oleg Cross</u> OLEG CROSS (SB # 246680)			
25	4370 La Jolla Village Dr., Suite 655			
26	San Diego, California 92122 Telephone: (619) 623-2120			
27	Facsimile: (619) 819-7346			
	Attorneys for Defendant Youngtek Solutions	Ltd.		
28	JOINT MOTION TO DISMISS CO)MPLAINT		

CROSS LAW GROUP
TRIAL COUNSEL
SAN DIEGO

JOINT MOTION TO DISMISS COMPLAINT WITHOUT PREJUDICE CASE NO. 10-CV-1972-JHA-(POR)

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1	CERTIFICATE OF SERVICE	
2	The undersigned does certify that the foregoing document was filed using the Court's	
3	CM/ECF system on February 3, 2011, which sent notice to Defendant Youngtek Solutions'	
4	counsel of record. As Plaintiff is currently unable to identify the remaining Doe defendants,	
5	Plaintiff is unable to serve them.	
7		
8	s/ Marc Randazza	
9	Marc J. Randazza, Esq., SBN 269535 Randazza Legal Group	
10	3969 Fourth Avenue, Suite 204 San Diego, CA 92103	
11	888-667-1113 305-437-7662 fax	
12	mjr@randazza.com	
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