## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

CHLOE TSAKIRIS ALSTON,

Plaintiff,

v.

Civil Action No. 1:20-cv-23013-BB

CALCULATOR.COM; UNKNOWN REGISTRANT a/k/a RUTH YAKOBZON; STANDS4 LTD; and GODADDY.COM, LLC,

Defendants.

## STIPULATION OF DISMISSAL OF STANDS4 LTD WITH PREJUDICE

Pursuant to Fed R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Chloe Tsakiris Alston ("Plaintiff") and Defendant Stands4 LTD ("Stands4"), through their respective counsel, hereby stipulate for dismissal of all claims against Defendant Stands4 LTD with prejudice.

Stands4 hereby gives notice that it will no longer contest the Plaintiff's ownership of the mark and domain name calculator.com, and Plaintiff hereby states that she is satisfied that Stands4 did not act in bad faith in relation to the acquisition of the calculator.com domain name.

All costs and attorney's fees will be paid by the party incurring the same.

Dated: August 13, 2020

By: /s/ Rafael Recalde

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Miami, FL 33161 Ph: 305-792-9100 Fax: 1-305-517-1407 By: /s/ Rafael Recalde Rafael Recalde, Esq.

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Attorneys for Defendant Stands4 LTD

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served on this 13th day of August, 2020 via e-service to:

Lydecker Diaz, attn.: Joan Carlos Wizel, jcw@lydeckerdiaz.com;

Wiley Rein LLP, attn.: David E. Weslow and Ari S. Meltzer, dweslow@wiley.law; ameltzer@wiley.law

/s/ Rafael Recalde Rafael Recalde, Esq. FBN: 60040