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5 Specially Appearing for Morgan E. Pietz and Nicholas Ranallo

6
7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

10 INGENUITY 13, LLC, a Limited Liability
11 Company Organized Under the Laws of the
Federation of Saint Kitts and Nevis,

12 Plaintiff,

13 vs.

14 JOHN DOE,

15 Defendant.
16

USDC Case No.: 2:12-cv-08333-ODW-JC
[Consolidated with Case Nos. 2:12-cv-6636;
2:12-cv-6669; 2:12-cv-6662; 2:12-cv-6668]

Courtroom: 11 [The Honorable Otis D.
Wright

STIPULATION TO BE RELIEVED OF
OBLIGATION TO FILE NOTICED
MOTION FOR SANCTIONS

17 ([Proposed] Order E-mailed Directly in
Judge Otis Wright's Chambers]

18 IT IS HEREBY STIPULATED by and between Morgan Pietz ("Pietz") and Nicholas
19 Renallo ("Renallo"), through their attorneys of record, Heller & Edwards, on the one hand, and
20 John Steele, appearing *pro se*, on the other hand, that Pietz and Renallo shall be relieved of any
21 obligation they may have to file a noticed motion for sanctions under Fed. R. Civ. P. Rule 11 in
22 connection with John Steele's Motion for Reconsideration of his Emergency Motion to Vacate
23 Orders and for Order to Show Cause.

24 The parties make this stipulation predicated upon the fact that the court in its Order
25 Denying the Motion for Reconsideration "directed" Pietz and Renallo to file the a motion for
26 sanctions. To the extent this direction is an order Pietz and Renallo seek to be relieved of any
27 obligation under that order.
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This stipulation is based on John Steele's agreement to forthwith pay the attorney's fees incurred by Pietz and Renallo for opposing the Motion for Reconsideration in the sum of \$5,400.00 as delineated in the declaration of Lawrence E. Heller filed in support of the Opposition to the Motion for Reconsideration.

IT IS SO STIPULATED:

DATED: July 19, 2013.

HELLER & EDWARDS

By: 
Lawrence E. Heller
Attorney for Plaintiff Morgan Pietz and Nicholas Renallo

DATED: July 21, 2013

By: 
John Steele
Appearing in pro se

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I declare that I am over the age of eighteen (18) years and not a party to this action. My business address is 9454 Wilshire Boulevard, Fifth Floor, Beverly Hills, California, and I am employed in the office of a member of the bar of this Court at whose direction this service was made.

On July 23, 2013, I served the foregoing document described as

***STIPULATION TO BE RELIEVED OF OBLIGATION TO FILE NOTICE
MOTION FOR SANCTIONS***

on all interested parties in this action by placing a true and correct copy of the document in a sealed envelope addressed as follows:

SEE PROOF OF SERVICE LIST

- BY MAIL** as follows: I am “readily familiar” with the firm’s practice of collection and processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope(s) was (were) sealed, and with postage thereon fully prepaid, placed for collection and mailing on this date in the United States Mail at Los Angeles, California.
- BY PERSONAL SERVICE** as follows: I caused such envelope(s) to be delivered by hand to the addressee(s) by _____ Messenger Service. Delivery was made to the attorney or at the attorney’s office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening.
- BY OVERNIGHT COURIER SERVICE** as follows: I caused the above-referenced document to be delivered to _____ for overnight courier service to the addressee(s).
- BY ELECTRONIC MAIL (email)** as follows: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF electronic filing system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 23, 2013, at Beverly Hills, California.

/s/Cora Mayrina
Cora Mayrina

1 **PROOF OF SERVICE LIST**

2 *Ingenuity 13, LLC v. John Doe*
3 USDC Case No.: 2:12-cv-08333-ODW-JC

4 [Consolidated with Case Nos. 2:12-cv-6636; 2:12-cv-6669; 2:12-cv-6662; 2:12-cv-6668]

5 **Via U.S. MAIL and email (where available)**

6 John Steele, Pro Se
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8 MIAMI BEACH FL 33139

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10 Peter Hansmeier, Pro Se
11 c/o Livewire Holdings, LLC
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23 **By ECF Electronic Notice:**

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41 Pro se and for Ingenuity 13, LLC and for AF Holdings, LLC

42 Prenda Law, Inc., through counsel Heather Rosing, Esq., and Philip Vineyard, Esq.
43 Putative John Doe, through counsel Morgan Pietz, Esq., and Nicholas Ranallo, Esq.
44 Morgan Pietz and Nicholas Ranallo, through special counsel Lawrence Heller, Esq