

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MAURICE J.P. TABONE,

Plaintiff,

v.

HARTMANN US INC. and THE
HAPPY GROUP INC. d/b/a HAPPY
EGG CO USA,

Defendants.

Case No. 4:23-cv-0986

Judge Sarah E. Pitlyk

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff, Maurice J.P. Tabone and Defendants, Hartmann US Inc. and The Happy Group Inc. d/b/a Happy Egg Co. USA (collectively, “Defendants”) (Plaintiff and Defendants are hereinafter collectively referred to as the “parties”), having entered into a mutually agreeable resolution of all claims and defenses asserted in the above-referenced action, hereby stipulate to the dismissal with prejudice of this entire case. Each party agrees to bear its own attorney fees, costs, and expenses.

Respectfully submitted,

/s/ Raymond P. Niro, Jr.

Raymond P. Niro, Jr.
RAYMOND P. NIRO LAW, LLC
155 North Wacker Drive, Suite 4250
Chicago, IL 60606
RPN@nirolawfirm.com
**ATTORNEY FOR PLAINTIFF,
MAURICE J.P. TABONE**

/s/ Stephanie N. Sivinski

Stephanie N. Sivinski (*pro hac vice*)
Bar Reg. No. 24075080 (TX)
Marron E. Frith (*pro hac vice*)
Bar Reg. No. 24137884 (TX)
HAYNES AND BOONE, LLP
2801 N. Harwood Street Suite 2300
Dallas, TX 75201
(214) 651-5000
stephanie.sivinski@haynesboone.com
marron.frith@haynesboone.com

Eugene Goryunov (pro hac vice)
Bar Reg. No. 6296605 (IL)
HAYNES AND BOONE, LLP
180 N. LaSalle St., Suite 2215
Chicago, Illinois 60601
(312) 216-1630
eugene.goryunov@haynesboone.com

/s/ Vincent K. Shier

Vincent K Shier, Ph.D. (pro hac vice)
Bar Reg. No. 71446 (VA)
Brown Rudnick LLP
601 13th Street NW, #600
Washington, DC 20005
(202) 536-1720
vshier@brownrudnick.com

**ATTORNEYS FOR DEFENDANT
HARTMANN US INC.**

/s/ Clifford T. Brazen

Carrie Bader (MO Bar 62233)
Megan J. Redmond (MO Bar 56932)
Clifford T. Brazen (admitted *pro hac vice*)
ERISE IP, P.A.
7015 College Blvd., Ste. 700
Overland Park, KS 66211
Tel: (913) 777-5600
Fax: (913) 777-5601
carrie.bader@eriseip.com
megan.redmond@eriseip.com
cliff.brazen@eriseip.com

**ATTORNEYS FOR DEFENDANT THE
HAPPY GROUP INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 18, 2024, the foregoing

**STIPULATION OF DISMISSAL
WITH PREJUDICE**

was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ Stephanie N. Sivinski

Stephanie N. Sivinski