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10 *Attorneys for Plaintiffs*

11
12 **IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 JOHN LOCKE and DAMION PERRINE,
14 individually and on behalf of all others
15 similarly situated,

Plaintiffs,

16 v.

17 SEGA OF AMERICA, INC., a California
18 corporation, and GEARBOX SOFTWARE,
19 L.L.C., a Texas limited liability company,

Defendants.

Case No. 3:13-cv-01962-JD

NOTICE OF SETTLEMENT

Judge: Honorable James Donato
Action Filed: April 29, 2013

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1 Plaintiffs John Locke and Damion Perrine (“Plaintiffs”) respectfully submit this notice to
2 advise the Court that Plaintiffs and Defendant Sega of America, Inc. (“Sega”) have reached a
3 settlement in principle that will resolve Plaintiffs’ claims against Sega in their entirety. Plaintiffs
4 and Sega are in the process of reducing their settlement to writing and expect to complete that
5 process within the next 30 days. Accordingly, Plaintiffs respectfully request that the Court enter an
6 order conditionally dismissing the case against Sega with prejudice, provided that if either Plaintiffs
7 or Sega certify to this Court, within sixty days, with proof of service of a copy thereon on opposing
8 counsel, that the agreed consideration for said settlement has not been delivered over, (i) the Court’s
9 conditional dismissal stand vacated and (ii) this case be restored to the calendar to be set for trial.

10 Dated: June 3, 2015

Respectfully submitted,

11 **JOHN LOCKE and DAMION PERRINE,**

12 By: /s/ Rafey S. Balabanian
13 One of Plaintiff’s Attorneys

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