

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHANE BECHLER,

Plaintiff,

- against -

MVP GROUP INTERNATIONAL, INC., BED BATH &
BEYOND INC., WAYFAIR LLC, JET.COM, INC.

Defendants.

Case No. 1:16-cv-08837 (LAP)

ECF Case

**JOINT STIPULATION REGARDING
DISMISSAL OF SECOND CAUSE OF ACTION**

Plaintiff Shane Bechler (“Plaintiff”), on the one hand, and Defendants MVP Group International, Inc., Bed Bath & Beyond Inc., Wayfair LLC, Jet.com, Inc. (collectively, “Defendants”), on the other hand, hereby agree, through their undersigned counsel, as follows:

WHEREAS Plaintiff filed a Complaint against Defendant on November 14, 2016 in the United States District Court, Southern District of New York, entitled *Bechler v. MVP Group International, Inc. et al.*, Case No. 1:16-cv-08837-LAP;

WHEREAS Plaintiff asserted two causes of action in is Complaint [Docket #1] against Defendants with the First Cause of Action for copyright infringement in violation of 17 U.S.C. §§ 106, 501 and the Second Cause of Action for removal of copyright management information in violation of 17 U.S.C. § 1202;

WHEREAS upon a meet and confer with Defendants, Plaintiff has agreed to dismiss his Second Cause of Action with prejudice of that claim only;

WHEREAS Defendants authorize Plaintiff to file this Stipulation with the Court in accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

THEREFORE Plaintiff and Defendants, by and through their undersigned counsel, hereby stipulate that Plaintiff agrees to dismiss his Second Cause of Action for removal of copyright management information under 17 U.S.C. § 1202 with prejudice regarding that claim only;

IT IS SO AGREED.

DATED: April 15, 2020

LIEBOWITZ LAW FIRM, PLLC

By: /s/Richard Liebowitz
Richard Liebowitz

Attorneys for Plaintiff Shane Bechler

DATED: April 15, 2020

BOND, SCHOENECK & KING, PLLC

By: /s/George McGuire
George R. McGuire

*Attorneys for Defendants MVP Group
International, Inc., Bed Bath & Beyond Inc.,
Wayfair LLC*

DATED: April 15, 2020

INGRAM YUZEK GAINEN CARROLL &
BERTOLOTTI, LLP

By: /s/Mioko Tajika
Mioko C. Tajika

Attorneys for Jet.com, Inc.