

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF TEXAS
DALLAS DIVISION**

**SAFETY NATIONAL CASUALTY
CORPORATION**

Plaintiff,

vs.

**MICHAELS STORES, INC.,
Defendant.**

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CIV. ACTION NO.

3:14-cv-02223-L

AGREED STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Plaintiff Safety National Casualty Corporation ("Safety National") files Stipulation of Dismissal without Prejudice and would show the Court as follows:

I.

STIPULATION OF DISMISSAL

1. Safety National requests this Court dismiss this matter without prejudice. Safety National as not previously dismissed any federal- or state-court action based on or including the same claim asserted in this matter. Defendant Michaels Stores, Inc. has not filed an Answer in this matter. This Stipulation of Dismissal is not solely for the purpose of delay.

PRAYER

Wherefore, Safety National prays this matter be dismissed without prejudice. Safety National prays for such other and further relief to which it may be entitled.

Respectfully submitted,

By: /s/ Paul Bezney

Paul A. Bezney – attorney in charge
State Bar No. 00787077
Bernie E. Hauder
State Bar No. 00923600

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ATTORNEYS FOR PLAINTIFF
SAFETY NATIONAL CASUALTY CORPORATION

CERTIFICATE OF CONFERENCE

I certify that I conferred by telephone with counsel for Defendant Michaels Stores, Inc. on July 22, 2014 concerning the merits of this motion. Counsel for Michaels Stores, Inc. agrees with this Motion.

/s/ Bernie E. Hauder
Bernie E. Hauder

CERTIFICATE OF SERVICE

I hereby certify that on this day, July 22, 2014, I electronically filed the above Agreed Stipulation of Dismissal and the Order regarding same using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Bernie E. Hauder
Bernie E. Hauder