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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 VPN.COM LLC,
20 *Plaintiff,*

21 vs.

22 GEORGE DIKIAN;
23 QIANG DU; and
24 JOHN DOE

25 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

26 **NOTICE OF VOLUNTARY**
27 **DISMISSAL AS TO DEFENDANT**
28 **QIANG DU**


1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff
2 VPN.COM LLC ("VPN") hereby gives notice that Defendant QIANG DU
3 ("Defendant Du") is hereby voluntarily dismissed from this action without
4 prejudice. Defendant Du has not served an answer or motion for summary
5 judgment in this action. Accordingly, dismissal is appropriate pursuant to Rule
6 41(a)(1)(A)(i).¹
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11 DATED: December 22, 2022

12 Brett E. Lewis
13 Michael D. Cilento
14 **LEWIS & LIN, LLC**

15 Ji-In Lee Houck (SBN 280088)
16 **STALWART GROUP**

17 By:

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19 Michael D. Cilento (*pro hac vice*)
20 Attorneys for Plaintiff VPN.COM LLC
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27 ¹ While VPN had previously informed this Court that VPN would seek a default judgment
28 against Defendant Du (ECF 30), after further consideration and investigation, at this time,
VPN believes it makes sense and wishes to proceed only against Defendant George Dikian.

Proof of Service

I, the undersigned, certify and declare that (i) I am over the age of 18 years, (ii) I am not a party to this action, (iii) I am admitted to practice law in this Court and case *pro hac vice*, and (iv) on December 22, 2022, I served a true and correct copy of the following documents to the following individuals by the following means:

Document: Notice of Voluntary Dismissal As to Defendant Qiang Du

To: George Dikian via ECF to attorney of record Michael L Rodenbaugh:
mike@rodenbaugh.com, docket@rodenbaugh.com,
jonathan@rodenbaugh.com

To: Qiang Du via email to rhwdomains@gmail.com

I declare under the penalty of perjury that the foregoing is true and correct.

By:



Michael D. Cilento