

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BOOMERJACK’S GRILL 7 BAR,
BOOMER JACK’S CITY VIEW, LLC

Plaintiff,

v.

Case No. 3:21-cv-01022

THE MEMBERS OF THE OWNERS
FIRST PROPERTY ASSOCIATION
SUBSCRIBING TO POLICY NO.
RBF002134; NAVIGATORS AGG C/O RT
SPECIALTY (POLICY #RBF002134);
HDI GLOBAL SPECIALTY (POLICY
#SE B018OPG1902618 AND/OR
PG1902618); AMTRUST AT LLOYD’S
(POLICY #B0180PGI901760 AND/OR
PG1901760); IRONSHORE (POLICY
#004093200); ATEGRITY (POLICY #01-
B-XP-P0000041 1-0); LEXINGTON
(POLICY #11 1448 12); ARK
SYNDICATE MANAGEMENT LTD.
(POLICY #B01 80PG19023 13); AGORA
SYNDICATE/WR BERKLEY (POLICY
#B0180PG1902310); AND BRIT
INSURANCE (POLICY #
B0180PG1902595)

Defendants.

STIPULATION FOR DISMISSAL WITH PREJUDICE

IT IS HEREBY STIPULATED by and between Plaintiff BOOMERJACK’S GRILL 7 BAR,
BOOMER JACK’S CITY VIEW, LLC and Defendants NAVIGATORS AGG C/O RT
SPECIALTY (POLICY #RBF002134); HDI GLOBAL SPECIALTY (POLICY #SE
B018OPG1902618 AND/OR PG1902618); AMTRUST AT LLOYD’S (POLICY
#B0180PGI901760 AND/OR PG1901760); IRONSHORE (POLICY #004093200);

ATEGRITY (POLICY #01-B-XP-P0000041 1-0); LEXINGTON (POLICY #11 1448 12); ARK SYNDICATE MANAGEMENT LTD. (POLICY #B01 80PG19023 13); AGORA SYNDICATE/WR BERKLEY (POLICY #B0180PG1902310); and BRIT INSURANCE (POLICY # B0180PG1902595), through their respective attorneys of record, that Plaintiff's Second Amended Petition filed against Defendants (as well as named defendant "THE MEMBERS OF THE OWNERS FIRST PROPERTY ASSOCIATION SUBSCRIBING TO POLICY NO. RBF002134") shall be dismissed with prejudice pursuant to FRCP 41(a)(1). Each party shall bear its own attorneys' fees and costs.

/s/ Tim Goss

Tim K. Goss

Texas Bar No. 08222660

Kevin L. Edwards

Texas Bar No. 24040853

Kevin L. Edwards

Freese & Goss, PLLC

3500 Maple Ave., Suite 1100

Dallas, TX 75219

Telephone: (214) 761-6610

Email: tim@freeseandgoss.com

Kevin@freeseandgoss.com

AND

David P. Matthews

Texas Bar No. 13206200

MATTHEWS & ASSOCIATES

2905 Sackett

Houston, TX 77098

Telephone: (713) 522-5250

Facsimile: (713) 535-71 32

Email: dmatthews@thematthewslawfirm.com

AND

Jeffrey Tillotson

State Bar No. 20039200

TILLOTSON LAW FIRM

1807 Ross Ave. #325
Dallas, Texas 75201
Telephone: 214.382.3043
Email: jtillotson@tillotsonlaw.com

Attorneys for Plaintiff

s/ Beth D. Bradley
Beth D. Bradley
Texas Bar No. 06243900
Tollefson Bradley Mitchell & Melendi, LLP
2811 McKinney Avenue, Suite 250 West
Dallas, Texas 75204
Tel.: (214) 665-0100
Facsimile: (214) 665-0199
bethb@tbmmlaw.com

AND

Wayne R. Glaubinger (pro hac vice) – Lead Counsel
Scott J. Sheldon (pro hac vice)
Mound, Cotton, Wollan & Greengrass, LLP
One New York Plaza, 44th Floor
New York, New York 10004
Tel.: (212) 804-4200
Facsimile: (212) 344-8066
wglaubinger@moundcotton.com
ssheldon@moundcotton.com

AND

Stephanie R. Tippit (admitted NDTx)
Texas Bar No. 24052969
Sarah Mohkamkar (admitted NDTx)
Texas Bar No. 24106321
Mound, Cotton, Wollan & Greengrass, LLP
3 Greenway Plaza, Suite 1300
Houston, Texas 77077
Tel.: (281) 572-8357
Facsimile: (212) 344-8066
stippit@moundcotton.com
smohkamkar@moundcotton.com

**Attorneys for Defendants, Navigators Specialty
Insurance Company, HDI Global Specialty SI – UK,
AmTrust at Lloyd's, Ategrity Specialty Insurance**

**Company, Ark Syndicate Management, Ltd., Agora
Syndicate Services, WR Berkley Syndicate 1967, and
Brit Insurance**

/s/ Julia M. Beckley

Julia M. Beckley

State Bar No. 24106716

Erin Bradham (*Pro Hac Vice* pending)

Keith Moskowitz (*Pro Hac Vice* pending)

2000 McKinney Ave., Suite 1900

Dallas, TX 75201

Tel.: (214) 259-0900

Facsimile: (214) 259-0910

julia.beckley@dentons.com

**Attorneys for Defendant, Lexington Insurance
Company**

/s/ Shannon M. O' Malley

Shannon M. O' Malley

Texas Bar No. 24037200

Michael P. O' Brien

Texas Bar No. 24103418

Zelle LLP

901 Main Street, Suite 4000

Dallas, TX 75202

Tel.: (214) 742-3000

Facsimile: (214) 760-8994

somalley@zelle.com

mobrien@zelle.com

**Attorneys for Defendant, Ironshore Specialty Insurance
Company**