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10 Attorneys for Defendant/Cross-Plaintiff
11 **RIPPLE LABS INC.**
[Additional counsel on signature page]

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 BITSTAMP LTD., a foreign company,
16 Plaintiff,

17 v.

18 RIPPLE LABS INC., a California Corporation,
JACOB STEPHENSON, an individual,
19 NANCY HARRIS, an individual, JED
MCCALEB, an individual, and DOES 1
20 Through 10, Inclusive,
21 Defendant.

Case No. 15-cv-01503-WHO

**AMENDED JOINT STIPULATION AND
ORDER TO DISMISS THIS
ACTION WITH PREJUDICE AND
RETURN THE DISPUTED FUNDS AND
XRP DEPOSITED WITH THE COURT**

Dept.: Courtroom 2, 17th Floor

Judge: Hon. William H. Orrick

22
23 RIPPLE LABS INC., a California Corporation,
24 Cross-Plaintiff,
25 v.
26 JED MCCALEB, an individual, JACOB
STEPHENSON, an individual, and DOES 1
27 Through 10, Inclusive,
28 Cross-Defendants.

1 Pursuant to Federal Rule of Civil Procedure 41(a)(2) and Local Rule 7-12 Defendants and
2 Cross-Defendants JED MCCALED, JACOB STEPHENSON and NANCY HARRIS, Defendant,
3 Cross-Claimant, and Cross-Defendant RIPPLE LABS INC. (“Ripple”), Intervenor-Defendant,
4 Cross-Claimant and Counterclaimant STELLAR DEVELOPMENT FOUNDATION (“SDF”),
5 Plaintiff and Cross-Defendant BITSTAMP LTD. (“Bitstamp”), and Cross-Defendant GEORGE
6 FROST (collectively, the “Parties”), through their undersigned counsel, hereby file the following
7 amended stipulated request for the Court to dismiss the Parties’ claims, counterclaims and cross-
8 claims against one another, with prejudice, and release the Interpleaded funds and XRP deposited
9 with the Court to SDF and Ripple, respectively.

10 WHEREAS, on April 1, 2015, Bitstamp initiated this interpleader action with the Court
11 naming Ripple, McCaleb, Stephenson, and Harris as defendants (the “Interpleader Action”);

12 WHEREAS, on April 29, 2015, Ripple filed cross-claims against McCaleb and Stephenson
13 (“Ripple’s Cross-claims”);

14 WHEREAS, SDF intervened in the Interpleader Action and, on August 12, 2015, filed
15 cross-claims against Ripple and Frost and filed a counterclaim against Bitstamp (“SDF’s
16 Counterclaims”);

17 WHEREAS, on or around June 5, 2015 Bitstamp deposited funds into Court’s registry, and
18 the Court is currently holding the sum of \$942,138.24 (the “Interpleaded Funds”);

19 WHEREAS, on or around July 29, 2013 Ripple deposited the private key to a Ripple
20 account containing 96,342,361.6 XRP, which the Court is currently holding (“Interpleaded XRP”);

21 WHEREAS, on or around August 5, 2015 the Parties stipulated and the Court subsequently
22 ordered that Stephenson shall maintain \$502.00 in Ripple account
23 r3Q3B6A2giHDMef83AztzBStBm1JBmxUKX (“r3Q”); and

24 WHEREAS, the Parties have reached settlements as to the claims, cross-claims, and
25 counterclaims against one another in the Interpleader Action, Ripple’s Cross-claims, SDF’s
26 Counterclaims, and the Arbitration (the “Settlement Agreements”) and wish to dismiss all claims
27
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1 against one another with prejudice, with each Party to bear its own fees and costs, except as
2 otherwise set forth in the Settlement Agreements.

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between the
4 Parties that:

5 1. The Court shall dismiss, with prejudice, Bitstamp's Interpleader Action, with no
6 fees or costs awarded to any Party;

7 2. The Court shall dismiss, with prejudice, Ripple's Cross-claims, with no fees or
8 costs awarded to any Party;

9 3. The Court shall dismiss, with prejudice, SDF's Counterclaims, with no fees or
10 and costs awarded to any Party;

11 4. The Court shall deliver the \$942,138.24 Interpleaded Funds and any accrued
12 interest currently in the Court's registry to SDF by sending a check payable to Stellar
13 Development Foundation to SDF's counsel, Gross Belsky Alonso LLP;

14 5. The Court shall deliver the private key to the 96,342,361.6 Interpleaded XRP
15 previously deposited with the Court to Ripple at an address specified by Ripple in a letter to the
16 Court with copies to counsel for the other parties; and

17 6. Stephenson is immediately relieved of his obligation to maintain a minimum
18 balance of \$502.00 in Ripple account r3Q3B6A2giHDMef83AztzBStBm1JBmxUKX.

19 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

20

21 Dated: April 12, 2016

Respectfully submitted,

22

By: /s/ Grant P. Fondo

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Dated: April 12, 2016

Respectfully submitted,

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Dated: April 12, 2016

Respectfully submitted,

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*Attorneys for Intervenor-Defendant/Cross-Plaintiff/
Counter-Plaintiff Stellar Development Foundation*

Dated: April 12, 2016

Respectfully submitted,

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Dated: April 12, 2016

Respectfully submitted,

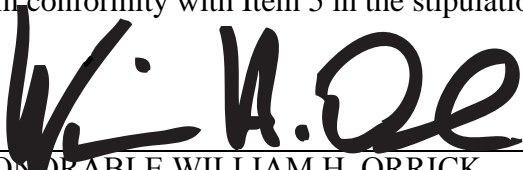
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George Frost*

PURSUANT TO STIPULATION, IT IS SO ORDERED. In this regard, the Court observes that the key has already been delivered in conformity with Item 5 in the stipulation.

DATED: April, 18, 2016



HONORABLE WILLIAM H. ORRICK
United States District Judge