

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

LIBERTY CORPORATE CAPITAL LTD.  
and AMTRUST CORPORATE MEMBER  
LTD.,

Plaintiffs,

v.

ROCHELLE G. CATUS,

Defendant.

CIVIL ACTION NO.:  
4:16-CV-816-JCH

**MOTION FOR JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs Liberty Corporate Capital, Ltd. and AmTrust Corporate Member Ltd. (collectively “Underwriters”) and Defendant Rochelle G. Catus (“Dr. Catus”) hereby move that that all claims in this action be dismissed with prejudice. Underwriters voluntarily dismiss their Complaint against Dr. Catus with prejudice, and Dr. Catus voluntarily dismisses her counterclaim against Underwriters with prejudice.

Submitted this 23<sup>rd</sup> day of March, 2017.

/s/ Gary K. Burger  
Gary Burger, #32460  
**Burger Law, LLC**  
500 N. Broadway Street, Suite 1350  
St. Louis, Missouri 63102  
(314) 542-2222  
(314) 542-2229 (FAX)  
gary@burgerlaw.com

/s/Bradley R. Hansmann  
Bradley R. Hansmann, #53160  
**BROWN & JAMES, P.C.**  
800 Market Street, Suite 1100  
St. Louis, Missouri 63101  
(314) 421-3400  
(314) 421-3128 (FAX)  
bhansmann@bjpc.com

AND

Paul L. Fields, Jr., Esq. (*pro hac vice*)  
Gregory L. Mast, Esq. (*pro hac vice*)  
**FIELDS HOWELL LLP**  
1180 W. Peachtree Street, Suite 1600  
Atlanta, GA 30309

404.214.1250 – Telephone  
404.214.1251 – Facsimile  
pfields@fieldshowell.com  
gmast@fieldshowell.com  
*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

LIBERTY CORPORATE CAPITAL LTD.  
and AMTRUST CORPORATE MEMBER  
LTD.,

Plaintiffs,

v.

ROCHELLE G. CATUS,

Defendant.

CIVIL ACTION NO.:  
4:16-CV-816-JCH

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of March, 2017, I served a copy of the foregoing **MOTION FOR JOINT STIPULATION OF DISMISSAL WITH PREJUDICE** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to the following counsel of record:

Gary K. Burger  
500 N. Broadway, Suite 1350  
St. Louis, MO 63102  
*Counsel for Defendant*

/s/ Bradley R. Hansmann  
Bradley R. Hansmann, #53160

#13470440