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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DELTA AIR LINES, INC.,)

Plaintiff,)

v.)

FLY TECH, LLC d/b/a)

TRIPKT.COM a/k/a FLYAIRS.COM)

a/k/a 1800CHEAPAIRTICKETS.COM;)

ROHIT SHARMA;)

WEBFLYTS, LLC)

a/k/a WEBFLYTS.COM;)

ANUPAM SATYASHEEL;)

RAJ SHARMA; KAVITA SHARMA;)

GOLDENDUST USA LTD. a/k/a)

ZUCCHI TRAVEL a/k/a)

EASYFLIGHTDEALS.COM;)

NEERU SINGH ADHIKARI;)

P. K. RAMACHANDRAN;)

EXPLORER TRAVEL CONSULTANTS,)

INC. d/b/a TRIPOSAVER.COM;)

HIREN TRIVEDI; HARSH VYAS;)

and JOHN DOES 1-5,)

Defendants.)

Civil Action No.
2:16-cv-02599-MCA-LDW

Motion Day: October 16, 2017

**JOINT NOTICE OF MOTION FOR ENTRY OF CONSENT PERMANENT
INJUNCTION AND DISMISSAL OF DEFENDANTS EXPLORER TRAVEL
CONSULTANTS, INC., AND HIREN TRIVEDI WITH PREJUDICE**

TO: Fly Tech, LLC d/b/a Triptkt.Com
178 Tonnele Avenue
Jersey City, New Jersey, 07306

Goldendust USA Ltd.
3420 E State Street
Hamilton, NJ 08619

Neeru Adhikari
25 Stanstead Manor
St. James Road
Sutton SM1 2AZ
United Kingdom

All Counsel of Record via ECF

PLEASE TAKE NOTICE that on October 16, 2017, or as soon thereafter as counsel may be heard, the undersigned counsel for Plaintiff, Delta Air Lines, Inc. (“Delta”), jointly with counsel for Defendants Explorer Travel Consultants, Inc., and Hiren Trivedi (the “Explorer Defendants”), shall move before the Honorable Madeline Cox Arleo, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for the following relief:

1. Entry of the proposed Consent Order of Permanent Injunction enclosed with this Notice of Motion, pursuant to Fed. R. Civ. P. 65 and 15 U.S.C. § 1116; and
2. Entry of an Order dismissing this action as against the Explorer Defendants, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(2).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civ. R. 7.1(d)(4), Delta and the Explorer Defendants jointly state that no brief in support of this motion is necessary, as this motion is being made pursuant to Fed. R. Civ. P. 41(a)(2) and a settlement reached between Delta and the Explorer Defendants. Delta and the Explorer Defendants have agreed to the entry of this injunction and dismissal as a part of their agreement to settle this case. The settlement is

the result of a compromise of disputed issues and does not represent or constitute an admission of any liability, a course of performance, or wrongdoing by Explorer Defendants.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order dismissing the case as against the Explorer Defendants, with prejudice, and a proposed Consent Order of Permanent Injunction, are being submitted herewith pursuant to Local Civ. R. 7.1(e).

Respectfully submitted this 21st day of September, 2017.

BLANK ROME LLP

s/ Nicholas C. Harbist

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*Attorneys for Defendants Explorer Traveler
Consultants, Inc., and Hiren Trivedi*

Attorneys for Plaintiff Delta Air Lines, Inc.

CERTIFICATE OF SERVICE

I, Nicholas C. Harbist, hereby certify that the Joint Notice of Motion for Entry of Consent Permanent Injunction and Dismissal of Explorer Traveler Consultants, Inc., and Hiren Trivedi with Prejudice and proposed forms of Order have been served via ECF on all counsel of record. Additionally, I hereby certify that I caused the above-described documents to be served on the below named defendants in default via Federal Express:

Fly Tech, LLC d/b/a Triptkt.Com
178 Tonnele Avenue
Jersey City, New Jersey, 07306

Goldendust USA Ltd.
3420 E State Street
Hamilton, NJ 08619

Neeru Adhikari
25 Stanstead Manor
St. James Road
Sutton SM1 2AZ
United Kingdom

Dated: September 21, 2017

s/ Nicholas C. Harbist
Nicholas C. Harbist