

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

)	
FEDERAL ENERGY)	
REGULATORY COMMISSION.)	
)	
Plaintiff,)	
)	Civil Action No. 3:15-cv-00452 (MHL)
v.)	
)	
POWHATAN ENERGY FUND LLC,)	
<i>et al.</i> ,)	
)	
Defendants.)	
)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Federal Energy Regulatory Commission (the “Commission”) and Defendants Houlian Chen, HEEP Fund, Inc., and CU Fund, Inc. (the “Chen Defendants”) hereby stipulate to the dismissal, with prejudice, of all of the Commission’s claims pending in the above-captioned suit as they pertain to the Chen Defendants.¹ The Commission and the Chen Defendants respectfully request that this Court issue an order dismissing the Commission’s claims against the Chen Defendants with prejudice. The Commission and the Chen Defendants shall bear their own costs and attorney’s fees.

¹ This stipulation in no way affects, alters, or resolves the Commission’s claims against Powhatan Energy Fund LLC in the above-captioned litigation.

/s/ Kevin Dinan

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*Counsel for Houlian Chen, HEEP Fund, Inc.,
and CU Fund, Inc.*

Dated: November 3, 2021

CERTIFICATE OF SERVICE

I certify that on November 3, 2021, I filed the foregoing notice using the CM/ECF system, which will send a notification of such filing to counsel of record in this matter.

/s/ Kevin Dinan

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Defendants.)	
)	

[PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE

Before the Court is the Joint Stipulation of Dismissal with Prejudice of Plaintiff Federal Energy Regulatory Commission and Defendants Houlian Chen, HEEP Fund, Inc., and CU Fund, Inc. (the “Chen Defendants”). Plaintiff and the Chen Defendants stipulate and request that the Court dismiss Plaintiff’s claims against the Chen Defendants with prejudice and without costs or fees to any party. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) and the joint wishes of Plaintiff and the Chen Defendants, the Court dismisses Plaintiff’s claims against the Chen Defendants with prejudice.

SO ORDERED, this the ____ day of _____, 2021.
