

41%
MCA JUDGMENT
BANK LIEN

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made and entered into on November 29, 2017, in Nassau County, New York, by and between [REDACTED] CAPITAL GROUP, LLC (“MCA”), and [REDACTED] PRODUCTS, INC. and [REDACTED] (collectively, the “COMPANY”).

WHEREAS, on November 26, 2017, a Judgment by Confession was entered, jointly and severally, against the Company, with Index No. [REDACTED] 17 in Nassau County Supreme Court of the State of New York (the “Judgment”);

WHEREAS, shortly after obtaining the Judgment, MCA directed a Levy (the “Levy”) to be served upon JPMorganChase Bank on November 28, 2017 in the amount of \$121,168.25 (“Judgment Balance”);

WHEREAS, the Parties to this Agreement desire to settle and resolve this action and all other outstanding issues between and among them in the amount of \$50,000.00 (“Settlement”);

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. Company shall pay the Settlement Amount to MCA as follows: (i) a release of \$50,000.00 to Marshal c/o MCA by JPMorganChase Bank via Conditional Release.
2. Company hereby fully and finally release, acquit and forever discharge MCA, its predecessors and successors from all actions, causes of action, torts, intentional acts, claims, demands, disputes, liabilities, obligations, damages, costs, attorneys' fees, expenses and compensation, of every nature whatsoever that could have been raised in this Action.
3. The Parties agree to make, execute and deliver any and all additional or other documents or papers reasonably deemed necessary in order to give full effect of this Stipulation.