

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR MARTIN COUNTY, FLORIDA**

AARON SCHAMBACK, DMD P.A., a
Florida corporation

Plaintiff,

CASE NO.: 24000680CAAXMX

v.

AARON BROWN AND ASSOCIATES,
INC., a Florida corporation, d/b/a
ELITE PAYROLL SOLUTIONS,

Defendant.

STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiff, AARON SCHAMBACK, DMD, P.A. ("Plaintiff"), and Defendant, AARON BROWN AND ASSOCIATES, INC. d/b/a ELITE PAYROLL SOLUTIONS ("Defendant"), by undersigned counsel, hereby inform the Court that they have entered into a Confidential Settlement Agreement that fully resolves all claims, counterclaims, proceedings and issues, brought, or could have been brought in this action, and pursuant to Florida Rule of Civil Procedure 1.420, hereby jointly stipulate to (a) the dismissal of this action with prejudice, with the parties to bear their own attorneys' fees and costs; and (b) the entry of the proposed Agreed Order Approving Stipulation and Dismissing All Claims with Prejudice attached hereto as **Exhibit A**.

Dated: June 19, 2025

Respectfully submitted,

/s/ Francis R. Deluca
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/s/ Preethi Sekharan
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served on June 19, 2025, via an automatic email generated by the Florida Courts E-Filing Portal which will send a notice of electronic filing to all parties of record.

/s/ Preethi Sekharan
PREETHI SEKHARAN, ESQ.
Florida Bar No. 813591

EXHIBIT "A"

COPY

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Plaintiff,

CASE NO.: 24000680CAAXMX

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INC., a Florida corporation, d/b/a
ELITE PAYROLL SOLUTIONS,

Defendant.

**AGREED ORDER APPROVING STIPULATION AND
DISMISSING ALL CLAIMS WITH PREJUDICE**

THIS CAUSE came before the Court on Plaintiff, AARON SCHAMBACK, DMD, P.A., and Defendant, AARON BROWN AND ASSOCIATES, INC., d/b/a ELITE PAYROLL SOLUTIONS Joint Stipulation of Dismissal (“**Stipulation**”), and the Court having reviewed the Stipulation, and being otherwise fully advised in the premises, does hereby,

ORDER AND ADJUDGE as follows:

1. The Stipulation is **APPROVED**.
2. This action, including all pending claims, is **DISMISSED WITH PREJUDICE**.
3. Each party shall bear its own attorneys’ fees, expenses, and costs.
4. The Clerk of the Court is directed to **CLOSE** the file.

DONE AND ORDERED in Chambers, in Martin County, Florida on this ____ Day of _____, 2025.

Hon. Elizabeth A. Metzger, Circuit Judge

A COPY OF THIS ORDER IS BEING SERVED ON THE FOLLOWING VIA THE E-FILING PORTAL:

SERVICE LIST
CASE NO. 2024CA000680CAAXMX

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