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Attorney for Plaintiff

2006 DEC -5 AM 11:19
E. ALABAO

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII, by its Office of Consumer Protection,)	CIVIL NO. 05-1-1356-07 SSM
)	(Other Civil Action)
)	
Plaintiff,)	STIPULATION WAIVING CERTAIN
)	CLAIMS, DISMISSING DEFENDANT
vs.)	DENISE A. CRISWELL AND
)	DISMISSING COUNT XIII OF THE
PACIFIC EDUCATIONAL SERVICES)	FIRST AMENDED COMPLAINT
COMPANY, a Nevada corporation dba)	WITHOUT PREJUDICE AND ORDER
Hawaii College of Pharmacy; DENISE)	
A. CRISWELL aka Deedee Criswell)	
aka DeDe Criswell aka Denise)	
Criswell Nakajima and DAVID)	
CHAMPION MONROE fka David Yacass,)	
)	Trial Date: May 14, 2007
Defendants.)	SCF Date: None
)	

STIPULATION WAIVING CERTAIN CLAIMS, DISMISSING
DEFENDANT DENISE A. CRISWELL AND DISMISSING
COUNT XIII OF THE FIRST AMENDED COMPLAINT WITHOUT PREJUDICE

IT IS HEREBY STIPULATED that Defendant Denise A. Criswell aka Deedee Criswell aka DeDe Criswell aka Denise Criswell Nakajima hereby waives any and all claims, damages, or potential causes of action of any kind whatsoever against the Plaintiff and Co-Receivers Rebecca S.P. Yee and Benjamin T. Fujimoto,

their counsel, agents, successors-in-interest, and assigns, and the assets of the Receivership, and Defendant Denise A. Criswell aka Deedee Criswell aka DeDe Criswell aka Denise Criswell Nakajima hereby indemnifies and holds harmless the Plaintiff and Co-Receivers Rebecca S.P. Yee and Benjamin T. Fujimoto, their counsel, agents, successors-in-interest, and assigns, and the assets of the Receivership against any and all claims, damages, or potential causes of action of any kind whatsoever that might be asserted against the Plaintiff or Co-Receivers Rebecca S.P. Yee and Benjamin T. Fujimoto, their counsel, agents, successors-in-interest, and assigns, and the assets of the Receivership, as to any such claims or similar claims that are or could be brought by her former husband Mr. Akihito Nakajima against the Plaintiff or Co-Receivers Rebecca S.P. Yee and Benjamin T. Fujimoto, their counsel, agents, successors-in-interest, and assigns, and the assets of the Receivership.

IT IS HEREBY FURTHER STIPULATED that Defendant Denise A. Criswell aka Deedee Criswell aka DeDe Criswell aka Denise Criswell Nakajima be and hereby is dismissed from this action without prejudice pursuant to Hawaii R. Civ.P.41(a)(1)(B).

IT IS HEREBY FURTHER STIPULATED that Count XIII of the First Amended Complaint be and hereby is dismissed from this action without prejudice pursuant to Hawaii R. Civ.P.41(a)(1)(B).

All parties who have appeared in this action have executed this stipulation.


DATED: Honolulu, Hawaii, DEC - 4 2006.



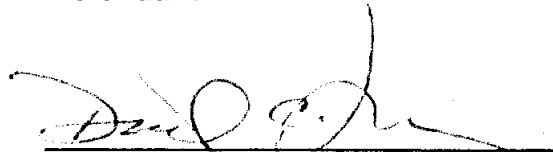
JEFFREY E. BRUNTON
Attorney for Plaintiff



PACIFIC EDUCATIONAL SERVICES COMPANY
By: David C. Monroe
Its: President
Defendant



DENISE A. CRISWELL
Defendant

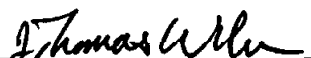


DAVID C. MONROE
Defendant



DAVID C. FARMER
Attorney for Co-Receivers

APPROVED AS TO FORM:



SIDNEY K. AYABE
J. THOMAS WEBER
RONALD T. MICHIOKA
Attorneys for Defendants

APPROVED AND SO ORDERED:

SABRINA S. MCKENNA



Judge of the Above-Entitled Court

Civil No. 05-1-1356-07 (SSM); State of Hawaii vs. Pacific Educational Services Company, et al.; STIPULATION WAIVING CERTAIN CLAIMS, DISMISSING DEFENDANT DENISE A. CRISWELL AND DISMISSING COUNT XIII OF THE FIRST AMENDED COMPLAINT WITHOUT PREJUDICE AND ORDER