

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

FREEDOM HOLDING, INC., ELITE  
WORLD GROUP, LLC, E1972 INC., and  
SILVIO SCAGLIA,

Plaintiffs,

v.

JULIA HAART A/K/A JULIA HENDLER  
and HAART DYNASTY LLC,

Defendants.

Index No. 650661/2022

**NOTICE OF VOLUNTARY DISCONTINUANCE OF CERTAIN CLAIMS WITHOUT  
PREJUDICE PURSUANT TO CLPR 3217(a)**

PLEASE TAKE NOTICE that pursuant to CLPR § 3217(a)(1), Plaintiffs Freedom Holdings, Inc.; Elite World Group, LLC (“EWG”); E1972 Inc. (“E1972”); and Silvio Scaglia (collectively, “Plaintiffs”), hereby voluntarily discontinue the following claims from their Complaint, without prejudice and without costs to any party:

- Sixth Cause of Action, in its entirety (Conversion (by EWG and E1972 against Haart));
- Seventh Cause of Action, in its entirety (Breach of Fiduciary Duty (by EWG and E1972 against Haart));
- Eight Cause of Action, in its entirety (Unjust Enrichment (by EWG and E1972 against Haart));
- Ninth Cause of Action, in its entirety (Waste of Corporate Assets (by EWG and E1972 against Haart)); and
- Tenth Cause of Action, in its entirety (Equitable Forfeiture/Faithless Servant Doctrine (by EWG against Haart)).

Dated: New York, New York  
May 27, 2022

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE

/s/ Peter A. Bicks

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