CAUSE NO. 2018-34640

FLEXSTEEL PIPELINE TECHNOLOGIES,	§	IN THE DISTRICT COURT OF
INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
DARREN LOUIS FEDON,	§	
	§	
Defendant.	§	113 TH JUDICIAL DISTRICT

AGREED MOTION TO ENTER FINAL JUDGMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff FlexSteel Pipeline Technology, Inc. and Defendant Darren Louis Fedon (collectively the "Parties") in the above-titled and numbered cause respectfully request this Court enter Final Judgment in this matter, and would show as follows:

I. BACKGROUND

- 1. On May 23, 2018, Plaintiff filed this lawsuit against Defendant, Darren Louis Fedon ("Fedon"), asserting claims for breach of fiduciary duty, fraud, civil theft, and conversion in connection with Fedon's employment as FlexSteel's Corporate Controller.
 - 2. The parties subsequently reached an agreement to settle this dispute.
- 3. On June 5, 2018, Plaintiff FlexSteel executed a Confidential Settlement Agreement ("Settlement Agreement"), fully resolving the claims at issue in this lawsuit. In exchange, Defendant Fedon was required to pay Plaintiff an agreed-upon settlement amount.

II. REQUEST FOR ENTRY OF JUDGMENT

- 4. There are no issues remaining in this case. The Parties agreed to resolve all claims in this case in accordance with the terms outlined in the Confidential Settlement Agreement.
- 5. Plaintiff and Defendant Fedon respectfully request this Court enter the Final Judgment, in the form attached hereto as **EXHIBIT A**, to fully and finally dispose of this matter.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request this Motion be granted and that Final Judgment be entered, and for such other and further relief to which the Parties may be justly entitled.

Respectfully submitted,

Foster C. Johnson

State Bar No. 24076463

fjohnson@azalaw.com

AHMAD, ZAVITSANOS, ANAIPAKOS

ALAVI & MENSING, P.C.

1221 McKinney Street, Suite 3460

Houston, Texas 77010

T: 713-655-1101

F: 713-655-0062

COUNSEL FOR PLAINTIFF FLEXSTEEL PIPELINE TECHNOLOGIES, INC.

Darren Louis Fedon

19806 Mulberry Pine Lane

Cypress, Texas 77429

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2018, a true and correct copy of the foregoing was served via email and regular U.S. Mail to all parties of record:

Darren Louis Fedon 19806 Mulberry Pine Lane Cypress, Texas 77429 darrenfedon@gmail.com

/s/ Foster Johnson	
Foster Johnson	