

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

MS2 CAPITAL, LLC, a Georgia
Limited Liability Company,

Plaintiff,

v.

RAJ SUTHAR, an individual,
and HUANG HUANG CHEN, a/k/a “ROMAN,”
a/k/a “COOKERFLIPS,”
a/k/a “WEFREEZETIME,”
a/k/a “TIMEFREEZE,” a/k/a “LUCKY CHEN,”
an individual, and JOHN DOES 1-10,

Defendants.

Case No.: 2:26-cv-01319-RMG

**STIPULATION OF DISMISSAL OF
DEFENDANT HUANG HUANG CHEN**

STIPULATION OF DISMISSAL OF DEFENDANT HUANG HUANG CHEN

Plaintiff stipulates a dismissal without prejudice of Defendant Huang Huang Chen (including various also known as aliases in the above caption) in the above-referenced matter. Plaintiff expects to be filing an Amended Complaint with a fuller explanation of the reasoning for this dismissal and intends to do so within the next seven (7) to ten (10) days.

[Signature Page to Follow]

Respectfully submitted,

By: /s/ Joseph P. Carlasare
Joseph P. Carlasare (*Admitted Pro Hac Vice*)
AMUNDSEN DAVIS, LLC
150 North Michigan Avenue, Suite 3500
Chicago, Illinois 60601
Telephone: (312) 894-3200
Facsimile: (312) 894-3210
jcarlasare@amundsendavislaw.com,

By: /s/ Mark V. Gende
Mark S. Barrow, Esq., Fed. I.D. No. 1220
Mark V. Gende, Esq., Fed. I.D. No. 9448
Kara N. Wagstaff, Esq., Fed I.D. No. 14620
Sweeny, Wingate & Barrow, PA
1515 Lady St.
Columbia, SC 29201
Telephone: (803) 256-2233
Facsimile: (803) 256-9177
msb@swblaw.com
mvg@swblaw.com
knw@swblaw.com

ATTORNEYS FOR THE PLAINTIFF

Columbia, South Carolina

June 1, 2026