

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NEXT LEVEL VENTURES, LLC, a Washington limited liability company,

Plaintiff,

No. 2:23-mc-00052-JCC

WRIT OF EXECUTION

v.

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AVID HOLDINGS LTD. F/K/A ALDEREGO GROUP LTD., a Hong Kong, S.A.R. limited liability company,

Defendant.

ALDEREGO |

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To the United States Marshal for the Western District of Washington or other officer authorized by law, you are directed to enforce the judgment described below with daily interest and your costs as provided by law.

On May 11, 2023, the United States District Court for the Western District of Washington, entered a judgment in favor of Petitioner Next Level Ventures, LLC ("Judgment Creditor" or "NLV") against Respondent AVID Holdings Ltd. f/k/a Alderego Group Ltd. ("Judgment Debtor" or "AVID") for \$892,020.55 with interest at the rate of 12% per year until paid, as well as declaratory relief, in Case No. 2:22-cv-01083-JCC (the "Judgment"). To date, no payments have been made to satisfy the Judgment.

The last known addresses of AVID are:

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AVID Holdings LTD f/k/a AlderEgoGroup, Ltd. 1 Room 21 Unit A, 11/F, Tin Wui Industrial Building No. 3 Hing Wong Street 2 Tuen Mun, N.T. Hong Kong 3 AlderEgo Group Ltd. 4 Room 1206, 12/F, Easter 397 Hennessy Road, Wan Chai, Hong Kong 5 People's Republic of China 6 AVID Holdings LTD f/k/a AlderEgoGroup, Ltd. 287 Park Ave S, 2nd Floor, 7 New York, NY 10010 8 In addition to these addresses, AVID can be reached through its counsel who made 9 appearances for AVID in this District in Case No. 2:22-cv-01083-JCC from which the judgment 10 issued, and Ninth Circuit Case No. 23-35404 where AVID has appealed the Judgment: 11 David J. Shlansky (David.Shlansky@slglawfirm.com) 12 Colin R. Hagan (Colin.Hagan@slglawfirm.com) SHLANSKY LAW GROUP, LLP 13 1 Winnisimmet Street Chelsea, MA 02150 14 15 Eliot M. Harris (eharris@williamskastner.com) WILLIAMS, KASTNER & GIBBS 16 601 Union Street, Suite 4100 Seattle, WA 98101-2380 17 18 You are directed to satisfy the unpaid portion of the judgment and award with interest 19 and any increased cost by taking into possession and selling the following non-exempt personal 20 property of AVID that is sufficient to satisfy the judgment, award, interest and increased costs: 21 All rights to and ownership interests in, held, or claimed by AVID in any and all intellectual property located in the United States, including but not limited to any and 22 all trademarks, copyrights, patents and/or trade secrets along with their associated 23 goodwill; 24 All trademarks, located in the United States, that are the subject of the license granted to NLV pursuant to the Exclusive Distribution Agreement (as amended and restated 25 effective April 20, 2020) and their associated goodwill, including, without limitation, "AVD" and "Advanced Vapor Devices" and the trademarks set forth on Schedule 1 to 26 the foregoing Exclusive Distribution Agreement; 27 WRIT OF EXECUTION

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- All contract rights belonging to or that may be claimed by AVID from any contract(s) to which AVID is a party, but **not including** AVID's rights in the Exclusive Distribution Agreement;
- All contract rights belonging to or that may be claimed by AVID under any contract to which AVID has rights as an assignee, successor, agent, third-party beneficiary, or other legal theory;
- All contract rights belonging to or that may be claimed by AVID under any contract between AVID and Jonathan Carfield;
- All contract rights belonging to or that may be claimed by AVID under any contract between AVID and Hanna(h) Carfield;
- All contract rights belonging to or that may be claimed by AVID under any contract between AVID and David Wu;

This personal property of AVID should be sold to satisfy the judgment. You should only sell AVID's personal property at a sale scheduled far enough in advance to allow compliance with the notice of sale requirements set forth in sections 6.17.130 and 6.21.020 of the Washington Code, which can take place no earlier than four weeks after the issuance of this Writ. No real property of AVID may be used to satisfy the judgment, award, interest, or increased costs.

Ravi Subramanian
Clerk
By:
Deputy Clerk

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1 **Presented By:** 2 Davis Wright Tremaine LLP Attorneys for Plaintiff Next Level Ventures, 3 LLC 4 By s/ Tim Cunningham Tim Cunningham, WSBA #50244 5 timcunningham@dwt.com 560 SW Tenth Avenue, Suite 700 6 Portland, OR 97205 Telephone: 503.241.2300 7 Fax: 503.778.5299 8 Dentons Durham Jones Pinegar Attorneys for Plaintiff Next Level Ventures, 9 LLC 10 David W. Tufts (pro hac vice) david.tufts@dentons.com 11 Madeline A. Hock (pro hac vice) madeline.hock@dentons.com 12 111 South Main Street, Suite 2400 Salt Lake City, UT 84111 13 Telephone: 801.415.3000 14 15 16 17 18 19 20 21 22 23 24 25 26 27 WRIT OF EXECUTION

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