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Telephone (801) 375-6600

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

BAM FRANCHISING, INC., a Delaware corporation; AMMON MCNEFF, an individual; MATTHEW MCNEFF, an individual; JOSH JOHNSON, an individual; BRANDON BEST, an individual; BAKER BRICKS, LLC, a Utah limited liability company, and dba SALEM-BAKER BRICKS INC., an Oregon corporation,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER, an individual, dba and aka “RECKLESS BEN”; RECKLESS BEN LLC, a California limited liability company; BRYAN MANSELL, an individual; VICTOR NGUYEN, an individual; and DOES 1-15,

Defendants.

**JOINT MOTION AND STIPULATION
REGARDING ENTRY OF PERMANENT
INJUNCTION AND DISMISSAL WITH
PREJUDICE OF REMAINING CLAIMS
AGAINST DEFENDANT BRYAN
MANSELL**

Case No. 2:26cv593

Judge David Barlow

Plaintiffs BAM Franchising Inc., Ammon McNeff, Matthew McNeff, Josh Johnson, Brandon Best, Baker Bricks, LLC and Salem-Baker Bricks Inc. (“**Plaintiffs**”), on the one hand, and Defendant Bryan Mansell (“**Mansell**”), on the other hand, jointly stipulate and hereby move

for the entry of a Permanent Injunction and for an Order of Dismissal with Prejudice respecting Plaintiffs' remaining claims against Mansell.

Relief Requested

Pursuant to a lengthy mediation and without admitting any fault, liability or wrongdoing of any kind relating to the underlying disputes, Plaintiffs and Mansell have informally reached and entered into an 8/16/26 *Settlement, Assignment of Claims, and Mutual General Release Agreement* ("**Settlement Agreement**"), whereby they have finally settled and resolved any and all disputes and claims between Plaintiffs and Mansell.

Accordingly and pursuant to the parties' Settlement Agreement, Plaintiffs and Mansell jointly stipulate and move the Court for entry of a *Permanent Injunction* in the form attached as **Exhibit A**, regarding which the Court will retain continuing and exclusive jurisdiction. Plaintiffs and Mansell also stipulate and move the Court for entry of an *Order of Dismissal with Prejudice* of Plaintiffs' remaining claims against Mansell, in the form attached as **Exhibit B**.

Plaintiffs' claims against co-Defendants other than Mansell are expressly reserved and nothing in the Permanent Injunction or Order of Dismissal shall be construed so as to affect any of such reserved claims. Each of Plaintiffs and Mansell shall be responsible for their own attorneys' fees and costs.

DATED this 27th day of August, 2026.

DENTONS DURHAM JONES PINEGAR P.C.

/s/ Wm. Kelly Nash
Wm. Kelly Nash
Justin Rich
Attorneys for Plaintiffs

SNELL & WILMER

/s/ Mark O. Morris (signed with permission)

Mark O. Morris

Attorneys for Defendant Bryan Mansell

Miller Nash LLP

/s/ Edward Decker (signed with permission)

Edward Decker

John Clarke

Attorneys for Bryan Mansell

CERTIFICATE OF SERVICE

This is to confirm that a true and correct copy of the foregoing was electronically filed on August 27, 2026 to counsel of record for the parties represented.

/s/ Justin Rich

Exhibit A

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

BAM FRANCHISING, INC., a Delaware corporation; AMMON MCNEFF, an individual; MATTHEW MCNEFF, an individual; JOSH JOHNSON, an individual; BRANDON BEST, an individual; BAKER BRICKS, LLC, a Utah limited liability company, and dba SALEM-BAKER BRICKS INC., an Oregon corporation,

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Defendants.

**PERMANENT INJUNCTION ORDER
REGARDING DEFENDANT MANSELL**

Case No. 2:26cv593

Judge David B. Barlow

Plaintiffs BAM Franchising, Inc., Ammon McNeff, Matthew McNeff, Josh Johnson, Brandon Best, and Baker Bricks, LLC, dba Salem-Baker Bricks, Inc. ("Plaintiffs") and Defendant Bryan Mansell ("Mansell") have jointly stipulated, agreed and moved the Court to enter this

Permanent Injunction. Based on the foregoing and for good cause shown, the Court hereby ORDERS and PERMANENTLY ENJOINS Mansell as follows:

1. Defendant Mansell, together with all persons identified in Fed. R. Civ. P. 65(d) (i.e., including his officers, agents, servants, employees, and attorneys, and any other persons in active concert or participation with anyone described in Rule 65(d)(2)(A) or (B)”)—are permanently restrained and enjoined from:

- a. Making, transmitting, soliciting, encouraging or facilitating death threats, bomb threats or other threats of physical violence and/or knowingly and intentionally engaging in property destruction, stalking, trespass, interference, extortion, personal injury or property damage against Plaintiffs, their independent franchisees, employees, officers, owners, customers, attorneys, vendors or family members;
- b. Publishing or encouraging others to publish personal addresses, personal phone numbers, personal email addresses, family information or other doxxing information of any kind regarding Plaintiffs’ personnel, franchisees, owners or employees;
- c. Knowingly entering, remaining at, filming, blocking access to, or approaching within a defined distance (not less than 100 yards) Plaintiffs’ or their franchisees’ stores, offices, warehouses, franchise locations, parking areas, employee homes or franchisee homes hereafter, except to peacefully enter and conduct legitimate business unrelated to the alleged conduct underlying this litigation or, through counsel, lawful service of process or court-approved activity.;
- d. Impersonating Plaintiffs, any franchisee, law enforcement, a court officer, a

delivery service, a customer, a government entity, employee or any other third party to obtain signatures, access, statements, employee information, audio/video recordings, customer information and/or to effectuate an interference or business disruption;

- e. Touching, altering, covering, defacing or placing signage or any other form of communication (i.e., electronic, social media, etc.) affecting Plaintiffs' or their franchisees' physical property;
- f. Physically blocking, deterring or interfering with customers, employees, vendors or delivery personnel doing business with Plaintiffs or their franchisees in any way, including entering or leaving any such locations; and
- g. Soliciting Plaintiffs' employees, franchisees or contractors to leak confidential information, record inside stores without authorization, obtain phone numbers or private information, or create or participate in staged confrontations.

2. Subject to the foregoing, nothing in this Order shall prohibit Defendant Mansell from discussing Plaintiffs, commenting on this litigation, publishing court filings, engaging in investigative journalism, expressing opinions, criticism, satire, and/or commentary, through any lawful means or methods he chooses, including, but not limited to, YouTube, TikTok, Instagram, and podcasts, and/or other internet, television, radio, and social media platforms.

3. This Permanent Injunction shall remain in effect until further order of the Court.

DATED this ____th day of August, 2026.

BY THE COURT

David Barlow
United States District Judge

APPROVED AS TO FORM:**DENTONS DURHAM JONES PINEGAR P.C.**

/s/ Wm. Kelly Nash
Wm. Kelly Nash
Justin T. Rich
Attorneys for Plaintiffs

SNELL & WILMER

/s/ Mark O. Morris (signed with permission)
Mark O. Morris
Attorneys for Defendant Bryan Mansell

MILLER NASH LLP

John C. Clarke (signed with permission)
Edward Decker
John C. Clarke
Attorneys for Defendant Bryan Mansell

Exhibit B

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

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Defendants.

**ORDER OF DISMISSAL WITH
PREJUDICE REGARDING DEFENDANT
BRYAN MANSELL**

Case No. 2:26cv593

Judge David Barlow

The Joint Motion and Stipulation Regarding Entry of Permanent Injunction and Dismissal with Prejudice of Remaining Claims Against Defendant Bryan Mansell came on regularly for consideration and disposition by the Court.

Having considered the Joint Motion and Stipulation of the parties, and finding good cause, the Court hereby grants the same, and orders as follows:

1. Except as relating to the Permanent Injunction against Mansell entered contemporaneously herewith, the Court orders that Plaintiffs' remaining claims against Mansell are hereby dismissed with prejudice. The Plaintiffs' claims against co-Defendants other than Mansell are expressly reserved. Each of Plaintiffs and Mansell shall be responsible for their own attorneys' fees and costs herein.
2. In connection herewith, the Court also enters a Permanent Injunction against Mansell as more particularly set forth in the Joint Motion and Stipulation.

DATED this ____th day of August, 2026.

BY THE COURT

David Barlow
United States District Judge

APPROVED AS TO FORM:**DENTONS DURHAM JONES PINEGAR P.C.**

/s/ Wm. Kelly Nash

Wm. Kelly Nash

Justin T. Rich

Attorneys for Plaintiffs

SNELL & WILMER

/s/ Mark O. Morris (signed with permission)

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Attorneys for Defendant Bryan Mansell

MILLER NASH LLP

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