

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action, by their respective
2 counsel, respectfully submit the following Joint Stipulation, and respectfully request that the
3 Court issue the following order:

4 WHEREAS, on March 17, 2021, the Court entered the parties' Stipulation and Order
5 ("March 17 Stipulation and Order"), ECF No. 475;

6 WHEREAS, the March 17 Stipulation and Order provided for a 14-day stay of this case,
7 beginning March 19, 2021 and ending April 2, 2021;

8 WHEREAS, the parties have continued to engage in good-faith discussions concerning
9 the potential resolution of this case, and the parties have reached agreement on key portions of
10 Plaintiffs' claims as further described in the accompanying Joint Case Management Statement;

11 WHEREAS, the parties have made significant progress towards reaching a resolution,
12 including the exchange of additional information and draft proposals, and believe they are now
13 on track to finalizing an agreement in principle over the next few weeks, which would then need
14 final approval by the Department of Justice. The parties believe that the public interest would be
15 served by staying all proceedings in this litigation for 14 additional days while the parties
16 continue these discussions.

17 THE PARTIES JOINTLY STIPULATE, AND RESPECTFULLY REQUEST THAT
18 THE COURT ORDER, AS FOLLOWS:

19 1. That the Court enter a 14-day stay of this case, effective beginning April 2, 2021 and
20 ending on April 16, 2021, with any deadlines currently due April 2, 2021 becoming due on April
21 16, 2021, and all other deadlines commensurately shifted;

22 2. That the Court enter a 14-day stay of proceedings related to Plaintiffs' Renewed
23 Motion to Compel, *see* ECF Nos. 462, 463, 464, to be coextensive with the requested stay of the
24 case as a whole;

25 3. That the Court continue the Case Management Conference currently scheduled for
26 Friday, April 2, 2021, until Friday, April 16, 2021;

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1 4. That the parties file a Joint Case Management Statement on April 15, 2021, for a
2 Further Case Management Conference on April 16, 2021 at 2:00 a.m. PT, where the parties will
3 update the Court with specifics as to any resolution reached or in process of being reached;

4 5. That, should the parties not reach earlier resolution, the case shall restart on April 16,
5 2021 under the same schedule currently in place,

6 6. Defendants will not, on the grounds of any stay, resist or challenge Plaintiffs taking
7 any of the depositions currently noticed or producing any of the documents and materials
8 Defendants currently are obligated to produce, but Defendants may assert the objections that they
9 would have had in the normal course.

10 Dated: April 1, 2021

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ATTESTATION

I, Sadik Huseny, am the ECF user whose user ID and password authorized the filing of this document. Under Civil L.R. 5-1(i)(3), I attest that all signatories to this document have concurred in this filing.

Dated: April 1, 2021

LATHAM & WATKINS LLP

By: /s/ Sadik Huseny
Sadik Huseny

~~PROPOSED~~ ORDER

1 The stipulation is GRANTED except that: (1) the parties shall file their joint case
2 management statement by April 15, 2021 at 2:00 p.m. Pacific Time, and (2) the Further Case
3 Management Conference is continued to April 16, 2021 at 10:00 a.m. Pacific Time.
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5 DATED: April 2, 2021

Lucy H. Koh

Lucy H. Koh
United States District Judge

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