



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 April 2, 2021, the Court partially entered the parties' Stipulation and  
5 Order ("April 2 Stipulation and Order"), ECF No. 475;

6 WHEREAS, the April 2 Stipulation and Order provided for a 14-day stay of this case,  
7 beginning April 2, 2021 and ending April 16, 2021;

8 WHEREAS, the parties have negotiated an agreement in principle subject to final  
9 approval by the Department of Justice and Plaintiffs; and

10 WHEREAS, the parties believe that the public interest would be served by staying all  
11 proceedings in this litigation for 7 additional days while the parties seek to obtain these  
12 approvals.

13 THE PARTIES JOINTLY STIPULATE, AND RESPECTFULLY REQUEST THAT  
14 THE COURT ORDER, AS FOLLOWS:

15 1. That the Court enter a 7-day stay of this case, effective beginning April 16, 2021 and  
16 ending on April 23, 2021, with any deadlines currently due April 16, 2021 becoming due on  
17 April 23, 2021, and all other deadlines commensurately shifted;

18 2. That the Court enter a 7-day stay of proceedings related to Plaintiffs' Renewed Motion  
19 to Compel, *see* ECF Nos. 462, 463, 464, to be coextensive with the requested stay of the case as  
20 a whole;

21 3. That the Court continue the Case Management Conference currently scheduled for  
22 Friday, April 16, 2021, until Friday, April 23, 2021;

23 4. That the parties file a Joint Case Management Statement by 2:00 p.m. PDT on April  
24 22, 2021, for a Further Case Management Conference on April 23, 2021 at 2:00 a.m. PDT, when  
25 the parties anticipate being in a position to discuss with the Court the specifics of any resolution  
26 on which approvals have been obtained;

27 5. That, should the parties not reach earlier resolution, the case shall restart on April 23,  
28 2021 under the same schedule currently in place,

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

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Dated: April 15, 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 15, 2021

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**[PROPOSED] ORDER**

The stipulation is GRANTED.

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Lucy H. Koh  
United States District Judge