

1 **RECITALS**

2 A. This matter is set to begin trial on August 31, 2015, with a Final Pretrial
3 Conference set for June 18, 2015.

4 B. Plaintiffs and Defendants (“the parties”) filed cross motions for partial
5 summary judgment scheduled to be heard on May 7, 2015.

6 C. The parties have participated in mediation and have reached a settlement
7 of all claims and issues presented by the above-titled lawsuit.

8 D. The parties wish to stay all proceedings in this matter pending the
9 finalization of their settlement in writing in order to avoid spending the Court’s time
10 and their own on motions, hearings and deadlines that will be rendered moot once the
11 settlement is consummated. The court previously took the parties’ cross motions for
12 partial summary judgment, set for May 7, 2015 hearing, off calendar and ordered this
13 case stayed until May 13, 2015 (Doc. 98).

14 E. Additional time is needed to complete the settlement given the multitude
15 of parties and complexity of issues.

16 **STIPULATION**

17 NOW, THEREFORE, in consideration of the foregoing, the parties hereby
18 stipulate to the following:

- 19 1. That all proceedings in this matter shall continue to be stayed;
20 2. That the parties will devote their efforts to finalizing settlement;
21 3. That the parties’ cross motions for partial summary judgment will
22 remain off calendar;
23 4. That the parties shall finalize their settlement and shall, by May 30,
24 2015, file with the Court a stipulation to dismiss the action;
25 5. That if the parties do not, by May 30, 2015, file a stipulation of
26 dismissal or a stipulation for further extension of the stay, then the Court may lift the
27 stay and restore the matter to the status quo ante;
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