

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”) have filed cross motions for
5 partial 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.

12 STIPULATION

13 NOW, THEREFORE, in consideration of the foregoing, the parties hereby
14 stipulate to the following:

15 1. That all proceedings in this matter shall be stayed, effective April 30,
16 2015;

17 2. That the parties will devote their efforts to finalizing settlement;

18 3. That the parties’ cross motions for partial summary judgment, set for
19 hearing on May 7, 2015, shall be taken off calendar;

20 4. That the parties shall finalize their settlement and shall, by May 13,
21 2015, file with the Court a stipulation to dismiss the action;

22 5. That if the parties do not, by May 13, 2015, file a stipulation of
23 dismissal or a stipulation for further extension of the stay, then the Court may lift the
24 stay and restore the matter to the status quo ante;

25 6. That if the stay is lifted, the parties’ cross motions for partial summary
26 judgment, currently set for May 7, 2015, shall be restored to the Court’s calendar and
27 set for hearing on **June 04, 2015 at 2:00 p.m.**

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