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10 *Oracle's counsel on signature page*

11  
 12 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 13 **SAN FRANCISCO DIVISION**

14 Michael Katz-Lacabe and Dr. Jennifer  
 15 Golbeck, on behalf of themselves and all  
 others similarly situated,

16 Plaintiffs,

17 vs.

18 ORACLE AMERICA, INC., a corporation  
 19 organized under the laws of the State of  
 Delaware,

20 Defendant.  
 21

Case No. 3:22-cv-04792-RS

**JOINT STIPULATION AND ORDER TO  
 STAY DISCOVERY AND VACATE CASE  
 DEADLINES**

Judge: Hon. Richard Seeborg  
 Dept: Courtroom: 3

Date Action Filed: August 19, 2022  
 Trial Date: None set

1 Pursuant to Civil Local Rules 7-12 and 6-2, Plaintiffs and Defendant Oracle America Inc.  
2 (“Oracle”) (collectively, the “Parties”), by and through their respective counsel of record, hereby  
3 stipulate as follows:

4 WHEREAS, on April 24, 2024, the Parties attended an arms-length mediation with a third-  
5 party neutral and have thereafter continued negotiations with the third-party neutral’s assistance;

6 WHEREAS, the Parties have now reached a classwide settlement in principle, subject to  
7 the approval of the Court;

8 WHEREAS, staying discovery in this matter and vacating all existing deadlines will  
9 preserve judicial resources and allow the Parties to focus their efforts on finalizing the settlement;

10 WHEREAS, the proposed stay will not prejudice any party and will serve the interests of  
11 judicial economy;

12 NOW, THEREFORE, subject to the approval of the Court, it is hereby stipulated and  
13 agreed that:

14 1. All existing hearings and case deadlines are vacated, including those concerning  
15 Plaintiffs’ motion to certify interlocutory appeal (Dkt. No. 120), but without prejudice to  
16 Plaintiffs renewing that motion should the prospective settlement not be approved;

17 2. The Parties anticipate they will finalize and execute a full-form settlement  
18 agreement on or before July 8, 2024;

19 3. Plaintiffs will file a motion for preliminary settlement approval promptly after the  
20 execution of a settlement agreement.

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Dated: May 9, 2024

/s/ Michael W. Sobol  
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*Attorneys for Plaintiffs and the Class*

Dated: May 9, 2024

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*Attorneys for Defendant Oracle America, Inc.*

Pursuant to stipulation, **IT IS SO ORDERED.**

Dated: 5/10/2024



Honorable Richard Seeborg  
United States District Court Judge