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 10 ATTORNEYS FOR PLAINTIFFS

6 UNITED STATES DISTRICT COURT  
 7  
 8 DISTRICT OF NEVADA

|  |                                    |
|--|------------------------------------|
| 9 Raymond Collins; Laura Fankuchen; )        | Case No. 2:14-CV-01587-JAD-VCF     |
| 10 Brandon Ferguson; Brian Hansen; Erin )    |                                    |
| 11 Kurpinski; Richard Martinez; Raymundo )   |                                    |
| 12 Navejar; Caroline Meyer; Allison Power; ) | <b>AMENDED STIPULATION AND</b>     |
| 13 Jay Queniahah; Jason Ratner; Esperanza )  | <b>ORDER TO STAY PROCEEDINGS</b>   |
| 14 Rico; Jessica Rodriguez; Steven Smith; )  | <b>FOR SIXTY (60) DAYS PENDING</b> |
| 15 Rosemary Viramontes; Nicholas )           | <b>THE RESOLUTION OF THIS</b>      |
| 16 Wheeler; Dana Withaegar, )                | <b>MATTER</b>                      |
| 17 )   |                                    |
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Plaintiffs,

vs.

WALGREEN CO., d/b/a WALGREENS;  
 EMPLOYEE(S)/AGENT(S) DOES 1- 10; and  
 ROE CORPORATIONS 11- 20, inclusive,

Defendants.

18 The parties, by and through their respective counsel of record, hereby stipulate and  
 19 request that the Court stay all proceedings in this case for a period of sixty (60) days while the  
 20 parties finalize their settlement of this case and prepare a stipulation of dismissal with prejudice.  
 21

22 This request for a stay is based upon the following:

- 23 1. Plaintiffs' Complaint was initially filed on September 26, 2014.
- 24 2. Defendants filed a motion to dismiss this case on February 16, 2015 (Doc. No.  
 25 20).
- 26 3. The Court set a hearing for defendants' motion to dismiss for May 11, 2015 at  
 27 1:30 p.m..
- 28 4. Since the filing of defendants' motion to dismiss, the parties have engaged in

1 successful settlement negotiations and have reached an agreement to settle this matter.

2 6. The parties are currently reducing the terms of their settlement agreement to  
3 writing and working cooperatively to prepare a stipulation of dismissal for filing with the Court.

4 7. Based upon the foregoing, the parties request the Court stay all proceedings for a  
5 period of sixty (60) days to allow the parties to finalize the terms of their settlement agreement  
6 and prepare a stipulation of dismissal. The parties request all proceedings remain stayed until  
7 **May 19, 2015.**

8 8. The parties jointly stipulate that defendants' motion to dismiss (Doc. No. 20) is  
9 deemed withdrawn and further request that the Court vacate the hearing set for May 11, 2015 at  
10 1:30 p.m. on defendants' motion to dismiss.

11 WHEREFORE, for good cause and for the reasons set forth above, the parties  
12 respectfully request that the Court stay the proceedings in this matter until **May 19, 2015** and  
13 vacate the hearing on May 11, 2015 at 1:30 p.m.

14 DATED this 19<sup>th</sup> day of March, 2015.

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SEYFARTH SHAW LLP

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26 **ORDER**

27 **IT IS SO ORDERED.**

28 DATE: March 23, 2015

  
UNITED STATES DISTRICT COURT JUDGE