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LLC; ARCA Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIELLE CURLEY, on behalf of herself
and all others similarly situated,

Plaintiff,

vs.

CUSTOMER CONNEXX LLC; ARCA,
INC.; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 2:18-cv-00233-KJD-GWF

**JOINT STIPULATION TO STAY ALL
PROCEEDINGS PENDING EARLY
SETTLEMENT NEGOTIATIONS AND
[PROPOSED] ORDER THEREON**

Plaintiff DANIELLE CURLEY (“Plaintiff”), by and through her counsel of record THIERMAN BUCK, LLP, and Defendants CUSTOMER CONNEXX LLC; ARCA, INC., by and through their counsel of record, JACKSON LEWIS, P.C., hereby stipulate to stay all proceedings and extend the deadline to file the Parties proposed Discovery Plan and Scheduling Order pending early settlement negotiations.

This request is made in good faith to allow the Parties to engage in early settlement negotiations. The purpose of the Stay is to promote judicial economy and allow this court to

- 1 -
**JOINT STIPULATION TO STAY ALL PROCEEDINGS PENDING EARLY SETTLEMENT
NEGOTIATIONS AND [PROPOSED] ORDER THEREON**

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1 more effectively control the disposition of the cases on its docket with economy of time and
2 effort for itself, for counsel, and the litigants. *See Landis v. N. Am. Co.* 299 U.S. 248, 254 (U.S.
3 1936) (“the power to stay proceedings is incidental to the power inherent in every court to
4 control the disposition of the causes on its docket with economy of time and effort for itself, for
5 counsel and for litigants.”)

6 Therefore, based on the foregoing and for good cause appearing, the Parties by and

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- 1 through the respective counsel of record, do hereby stipulate and agree as follows:
2 1) The above captioned dispute shall be stayed until fourteen (14) days after the
3 scheduled mediation to take place on or before July 16, 2018 hereinafter the "Stay Period";
4 2) Fourteen (14) days after the termination of the Stay Period:
5 a) The Parties will file a case update; or
6 b) The Parties shall file a proposed Discovery Plan and Scheduling Order.

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8 Dated: April 16, 2018 Dated: April 16, 2018
9 THIERMAN BUCK, LLP JACKSON LEWIS
10
11 /s/ Joshua D. Buck /s/ Veronica T. von Grabow
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21 *Attorneys for Defendants*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 Dated this 17th day of April, 2018

25 
26 UNITED STATES DISTRICT JUDGE