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11 Attorneys for Defendants
 12 FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE,
 and 21st CENTURY INSURANCE COMPANY

13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16
 17 RONALD STALLONE, on behalf of himself
 and all other persons similarly situated,

18 Plaintiff,

19
 20 v.

21 FARMERS GROUP, INC., a Nevada
 22 Corporation; FARMERS INSURANCE
 EXCHANGE; and 21st CENTURY
 23 INSURANCE COMPANY,

24 Defendants.
 25
 26

Case No. 2:21-cv-01659-GMN-MDC

**STIPULATION AND ORDER TO STAY
 ALL DEADLINES TO FINALIZE
 SETTLEMENT**

SECOND REQUEST

STIPULATION AND ORDER TO
 STAY ALL DEADLINES TO
 FINALIZE SETTLEMENT

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1 Pursuant to the Court’s April 6, 2024 order, ECF No. 82, Plaintiff Ronald Stallone
2 (“Plaintiff”) and Defendants Farmers Group, Inc., Farmers Insurance Exchange, and 21st Century
3 Insurance Company (“Defendants”) (collectively, the “Parties”) hereby provide the following
4 joint status report:

5 The Parties have been working cooperatively on a settlement agreement, which they
6 anticipate executing in the coming days. Accordingly, to conserve the Parties’ and the Court’s
7 resources, to promote judicial economy, and to allow the Parties to finalize the resolution of
8 this matter, the Parties respectfully request that the Court ~~stay~~ ^{vacate} all deadlines, including the
9 deadlines set forth in Court’s Order granting the Parties’ Stipulation for Extension of Case
10 Deadlines (ECF No. 76), for 45 days to allow the Parties to (1) finalize a formal settlement
11 agreement, (2) complete the steps set forth in the settlement agreement (e.g., exchange W-9s,
12 obtain the necessary signatures, make the settlement payment), and file the notice of dismissal.

13 Subject to the Court’s approval, in the unlikely event the Parties do not finalize a
14 formal settlement agreement within 45 days, the Parties propose they file a status report within
15 45 days of the date of this order, which will address the status of the Parties’ negotiations and
16 potential ///

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1 adjustments to the case schedule, including an amended proposed discovery plan and scheduling
2 order.

3 Respectfully submitted this 6th day of May, 2024.

4 KIND LAW FIRM

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24 Attorneys for Plaintiff Stallone

25 IT IS SO ORDERED.

/s/ Jennifer K. Hostetler

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Attorneys for Defendants

FARMERS GROUP, INC., FARMERS

INSURANCE EXCHANGE, AND 21st

CENTURY INSURANCE COMPANY

IT IS SO ORDERED that all pending
deadlines are vacated but a Joint Status
Report is due in 45 days of this Order.

26 
U.S. DISTRICT COURT JUDGE

STIPULATION AND ORDER TO
STAY ALL DEADLINES TO
FINALIZE SETTLEMENT - 2

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