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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 OAKLAND DIVISION

21 CHASOM BROWN, WILLIAM BYATT,  
22 JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all other  
23 similarly situated,

24 Plaintiffs,  
25 v.

26 GOOGLE LLC,  
27 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT NOTICE OF PRELIMINARY  
SETTLEMENT AND REQUEST FOR  
STAY AND VACATUR OF TRIAL DATE**

Judge: Hon. Yvonne Gonzalez Rogers

1 Through mediation facilitated by the Honorable Layn R. Phillips, Plaintiffs and Google LLC  
2 have agreed to a binding term sheet that would resolve the claims in this litigation, pending the  
3 Court's approval. The Parties are presently preparing a final and definitive settlement agreement,  
4 which they anticipate executing within 30 days of this filing and then presenting for this Court's  
5 approval within 30 days thereafter (*i.e.*, within 60 days of this filing). To avoid any unnecessary  
6 waste of judicial resources and to allow the Parties to focus their efforts entirely on finalizing the  
7 settlement, the Parties jointly and respectfully request that the Court stay this litigation in its entirety  
8 and vacate the trial date. The Parties thank the Court for its attention to this matter.

9 DATED: December 26, 2023

DATED: December 26, 2023

10 QUINN EMANUEL URQUHART &  
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11 By: /s/ Andrew H. Schapiro

By: /s/ Mark C. Mao

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**ATTESTATION**

I, Mark Mao, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 26, 2023

By: /s/ Mark Mao