

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

LAUREN COMBS,  
on behalf of Plaintiff and a class,

Plaintiff,

vs.

MAKES CENTS, INC.,  
doing business as MaxLend;  
UETSA TSAKITS, INC.;  
DAVID JOHNSON;  
KIRK MICHAEL CHEWNING; and  
CANE BAY PARTNERS VI, LLLP;

Defendants.

Case No. 3:22-cv-50006

Honorable Iain D. Johnston

**NOTICE AND REQUEST TO STAY PENDING DEADLINES**

Plaintiff, Lauren Combs, and Defendants Makes Cents, Inc., Uetsa Tsakits, Inc., David Johnson, Kirk Chewning, and Cane Bay Partners VI, LLLP (collectively, “Defendants”) respectfully submit this notice to inform the Court that the Parties have resolved this matter and expect to file a stipulation of dismissal within the next 45 days. The Parties request that the Court stay all pending deadlines including the JISR deadline of March 10, 2022.

Respectfully submitted,

DATED: March 10, 2022

/s/ Matthew J. Goldstein  
Matthew J. Goldstein  
Tara L. Goodwin  
Daniel A. Edelman  
EDELMAN COMBS LATTURNER  
& GOODWIN, LLC  
20 S. Clark St., Suite 1500  
Chicago, IL 60603  
(312) 739-4200  
courtecl@edcombs.com  
*Counsel for Plaintiff*

/s/ Ellen M. Carey  
Ellen M. Carey  
FORDE & O’MEARA LLP  
191 North Wacker Drive, 31st Floor  
Chicago, IL 60606  
Tel: (312) 399-2377  
Email: ecarey@fordellp.com

/s/ Ashley Vinson Crawford  
Ashley Vinson Crawford (*pro hac vice pending*)  
Danielle C. Ginty (*pro hac vice pending*)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
580 California Street, Suite 1500

San Francisco, CA 94104  
Tel: (415) 765-9500  
Fax: (415) 765-9501  
Email: avcrawford@akingump.com  
Email: dginty@akingump.com

*Attorneys for Defendants*  
Cane Bay Partners VI, LLLP, David Johnson, and  
Kirk Michael Chewning

/s/ Troy E. Haggstad  
Troy E. Haggstad  
Williams McCarthy LLP  
120 W. State Street, 4th Floor  
Rockford, IL 61101  
Tel: (815) 987-8900  
Fax: (815) 987-8919  
Email: thaggstad@wilmac.com

/s/ Nicole E. Ducheneaux  
Nicole E. Ducheneaux (*pro hac vice pending*)  
Leonika R. Charging-Davison  
(*pro hac vice pending*)  
Big Fire Law & Policy Group, LLP  
1404 Fort Crook Road South  
Bellevue, NE 68005  
Tel: (531) 466-8725  
Fax: (531) 466-8792  
Email: nducheneaux@bigfirelaw.com  
Email: lcharging@bigfirelaw.com

*Attorneys for Defendants*  
Makes Cents, Inc. and Uetsa Tsakits, Inc.

**CERTIFICATE OF SERVICE**

I, Matthew J. Goldstein, hereby certify that on Thursday, March 10, 2022, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF online system, which sent notice via email to all counsel of record.

/s/ Matthew J. Goldstein  
Matthew J. Goldstein

Daniel A. Edelman  
Tara L. Goodwin  
Matthew J. Goldstein  
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
20 South Clark Street, Suite 1500  
Chicago, IL 60603-1824  
(312) 739-4200  
(312) 419-0379 (FAX)  
[dedelman@edcombs.com](mailto:dedelman@edcombs.com)  
[tgoodwin@edcombs.com](mailto:tgoodwin@edcombs.com)  
[mgoldstein@edcombs.com](mailto:mgoldstein@edcombs.com)  
Email address for service: [courtecl@edcombs.com](mailto:courtecl@edcombs.com)