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SAMSUNG ELECTRONICS AMERICA, INC.

[Counsel for Plaintiff on Signature Page]

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ANTHONY RAY GONZALEZ,  
individually and on behalf of all others  
similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendant.

Case No. 2:24-cv-11234-SB-RAO

**JOINT NOTICE OF RESOLUTION AND  
REQUEST TO VACATE PENDING  
DEADLINES**

[Proposed] Order Filed Concurrently

Assigned to Hon. Stanley Blumenfeld, Jr.  
Action filed: December 31, 2024

Pursuant to the Court's Standing Order for Civil Cases at Section 1(d), Defendant Samsung Electronics America, Inc. ("SEA") and Plaintiff Anthony Ray Gonzalez ("Plaintiff"), by and through their respective counsel, notify the Court that the parties have reached an agreement to resolve this action, which will result in its dismissal with prejudice under Federal Rule of Civil Procedure 41. The parties are in the process of preparing a written agreement and stipulation of dismissal. To allow time for preparation and execution of the written agreement and filing of the stipulation of dismissal, the parties jointly request that:

- (1) The deadlines in the Court's March 4, 2025 Order (Dkt. 16), which requires SEA to respond to Plaintiff's Complaint by today (March 19, 2025), be vacated;
- (2) The action be administratively closed; and
- (3) The Court set a deadline of April 7, 2025 for the parties to file all papers necessary to dismiss the action under Federal Rule of Civil Procedure 41 (or, if necessary for some unanticipated reason, request that the action be reopened).

Respectfully submitted by,

Dated: March 19, 2025

**GREENBERG TRAURIG, LLP**

By: /s/ Michael E. McCarthy  
Michael E. McCarthy  
Attorneys for Defendant  
Samsung Electronics America, Inc.

Dated: March 19, 2025

**CLARKSON LAW FIRM, P.C.**

By: /s/ Yana Hart  
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Attorneys for Plaintiff  
Anthony Ray Gonzalez

1 I, Michael E. McCarthy, am the CM/ECF user whose ID and password are being  
2 used to file this JOINT NOTICE OF RESOLUTION AND REQUEST TO VACATE  
3 PENDING DEADLINES. Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that  
4 counsel on whose behalf this filing is jointly submitted have concurred in this filing's  
5 content and have authorized the filing.

6 Dated: March 19, 2025

By: s/ Michael E. McCarthy

Michael E. McCarthy