# <u>UNITED STATES DISTRICT COURT</u> WESTERN DISTRICT OF NEW YORK

IN RE: FISHER-PRICE ROCK 'N PLAY SLEEPER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION MDL No. 1:19-md-2903

Hon. Geoffrey W. Crawford

This Document Relates To: ALL CASES

# JOINT NOTICE OF SETTLEMENT AND STIPULATION AND [PROPOSED] ORDER TO RESET DEADLINES

Plaintiffs and Defendants Mattel, Inc. and Fisher-Price, Inc. submit the following Joint Notice of Settlement and Stipulation and [Proposed] Order to Reset Deadlines.

The parties hereby provide notice to the Court that they have reached a settlement in principle that will resolve in full this multi-district litigation. The parties will be memorializing the settlement in a full settlement agreement, and Plaintiffs will be preparing a motion for preliminary approval of the settlement that will include a notice plan. The parties anticipate that the settlement agreement will be completed, and Plaintiffs anticipate that they will be able to file the settlement agreement, and a motion for preliminary approval of the settlement, by April 12, 2024.

As a result of this development, the parties respectfully request that the Court take off the calendar the hearing on Plaintiffs' Motion for Certification of the Settlement Class and the Initial Pretrial Conference currently scheduled for February 23, 2024, and enter an order requiring Plaintiffs to file a motion for preliminary approval of the settlement on or before April 12, 2024.

Respectfully submitted, this 13<sup>th</sup> day of February, 2024.

# /s/ Demet Basar

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IT IS SO ORDERED.

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