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Counsel for Plaintiffs and Proposed Class

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LLE ONE, LLC, *et al.*,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No.: 4:16-cv-06232-JSW

**STIPULATION AND [PROPOSED]
ORDER TO STAY LITIGATION
DEADLINES IN LIGHT OF
SETTLEMENT**

Dept: Courtroom 5, 2nd Floor
Judge: Jeffrey S. White

1 The parties, through their undersigned counsel and subject to the Court's approval, stipulate
2 as follows:

3 1. WHEREAS, this is a proposed class action lawsuit, initiated in October 2016.

4 2. WHEREAS, this litigation is currently subject to a case schedule set forth in the
5 Court's order dated November 14, 2018, (ECF No. 172).

6 3. WHEREAS, that schedule requires, among other things, that Plaintiffs file their
7 motion for class certification this Friday, June 14, 2019, (*id.*).

8 4. WHEREAS, in April 2019, the parties participated in a mediation with the
9 Honorable Vaughn R. Walker (Ret.).

10 5. WHEREAS, over the course of the two months following the mediation, with Judge
11 Walker's assistance, the parties continued their efforts to settle the litigation.

12 6. WHEREAS, the parties have now agreed to terms on a classwide settlement that
13 would fully resolve this litigation.

14 7. WHEREAS, the parties intend to promptly memorialize their settlement in a formal
15 written agreement, which they will then present for Court approval under Federal Rule of Civil
16 Procedure 23(e).

17 8. WHEREAS, in the interest of sparing judicial resources and ensuring that the parties
18 can devote their attention to finalizing and presenting their settlement to the Court for approval, the
19 parties respectfully request that all current litigation deadlines be stayed.

20 THEREFORE, IT IS HEREBY STIPULATED, subject to the Court's approval, that:

21 1. All pending litigation deadlines shall be stayed.

22 2. The parties shall work diligently to present their proposed settlement to the Court and
23 shall file a motion for preliminary settlement approval no later than 60 days after the Court
24 approves this stipulation.

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IT IS SO STIPULATED AND AGREED.

DATED: June 12, 2019

GIBBS LAW GROUP LLP

By: /s/ Eric H. Gibbs

*Attorney for Plaintiffs and the
Proposed Class*

DATED: June 12, 2019

KEKER, VAN NEST & PETERS LLP

By: /s/ David J. Silbert

Attorney for Defendant Facebook, Inc.

ATTESTATION

I attest that for all conformed signatures indicated by an “/s/,” the signatory has concurred in the filing of this document.

DATED: June 12, 2019

/s/ Eric H. Gibbs

[PROPOSED] ORDER

Based on the stipulation of the parties, it is so ordered. All pending litigation deadlines shall be stayed. The parties shall file their motion for preliminary settlement approval no later than 60 days from the date of this order.

IT IS SO ORDERED.

Dated: _____

HON. JEFFREY S. WHITE
United States District Judge