CASE NO.: 2:23-CV-01372-JNW

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Plaintiffs Laura Abbott, Jill Cappel, Michelle Estep, Maria Khangi, Joshua Soto Lopez, Melissa Urbancic, Heriberto Valiente, Katherine Vojtko, Vince Vojtko, and Dianne Walton-Williams ("Plaintiffs") and Defendant Amazon.com, Inc. jointly move the Court to stay proceedings, vacate all case deadlines, and hold the case in abeyance because the parties have reached a settlement in principle. The Parties base their stipulated motion on the following facts:

The Parties have attended arms-length mediation sessions with a third-party neutral and have conducted negotiations with the third-party neutral's assistance;

The Parties have reached a class-wide settlement in principle that they have memorialized in a binding term sheet;

The Parties anticipate executing a final, long-form Settlement Agreement, and Plaintiffs anticipate filing a motion for preliminary approval of the class settlement within the next 45 days.

If a motion for preliminary approval is not filed by December 5, 2025, the Parties will file a report to the Court with the status of the Settlement Agreement and Plaintiffs' motion for preliminary approval.

The Parties believe that staying all proceedings, vacating case deadlines, and holding the case in abeyance will conserve judicial and party resources.

Accordingly, the Parties jointly stipulate and move the Court to stay proceedings, vacate all case deadlines, and hold the case in abeyance.

Dated: October 20, 2025	Respectfully submitted,
	FENWICK & WEST LLP

By: <u>/s/ Brian D. Buckley</u> Brian D. Buckley, WSBA No. 26423

> Deena J.G. Feit, WSBA No. 29036 401 Union Street, 5th Floor Seattle, WA 98101 Telephone: 206.389.4510 Facsimile: 206.389.4511 bbuckley@fenwick.com dfeit@fenwick.com

Jedediah Wakefield (admitted pro hac vice)

STIPULATED MOTION FOR STAY AND PROPOSED ORDER CASE NO.: 2:23-CV-01372-JNW

1		Mary Griffin Sims (admitted <i>pro hac vice</i>) 555 California Street, 12th Floor
2		San Francisco, CA 94104 Telephone: 415.875.2300
3		Facsimile: 415.281.1350
4		jwakefield@fenwick.com mgriffin@fenwick.com
5		Moez M. Kaba (admitted pro hac vice)
6		Katharine Ross (admitted <i>pro hac vice</i>) HUESTON HENNIGAN LLP
7		523 West 6th Street, Suite 400 Los Angeles, CA 90014
<u> </u>		Telephone: 213.788.4340
8		mkaba@hueston.com kross@hueston.com
9		Brandon C. Marsh (admitted pro hac vice)
10		HUESTON HENNIGAN LLP 620 Newport Center Drive, Suite 1300
11		Newport Beach, CA 92660 Telephone: 949.788.4340
12		bmarsh@hueston.com
13		Attorneys for Defendant Amazon.com, Inc.
14	D . 1 0 . 1 . 20 2025	
15	Dated: October 20, 2025	QUINN EMANUEL URQUHART & SULLIVAN, LLP
16		
17		By: /s/ Nolan Anderson
		Alicia Cobb, WSBA #48685
18		Matthew Hosen, WSBA #54855 Nolan Anderson, WSBA # 59691
19		1109 First Avenue, Suite 210 Seattle, WA 98101
20		Tel.: 206.905.7000
21		Fax: 206.905.7100 aliciacobb@quinnemanuel.com
		matthosen@quinnemanuel.com
22		nolananderson@quinnemanuel.com
23		Andrew H. Schapiro (<i>pro hac vice</i>) QUINN EMANUEL
24		URQUHART & SULLIVAN, LLP 191 N. Wacker Drive, Suite 2700
25		Chicago, IL 60606
26		Tel: 312.705.7400 Fax: 312.705.7401
		andrewschapiro@quinnemanuel.com
27		Adam Wolfson (pro hac vice)
28		Justin C Griffin (pro hac vice)
	STIPULATED MOTION FOR STAY AND PROPOSED ORDER	FENWICK & WEST LLP 401 Union Street, 5th Floor

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Alyssa G. Olson (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN LLP
865 S Figueora Street, 10th Floor
Los Angeles, CA 90017
213.443.3000
213.443.3100
adamwolfson@quinnemanuel.com
justingriffin@quinnemanuel.com
alyolson@quinnemanuel.com

Aaron M. Zigler (pro hac vice) Lawrence Ashe (pro hac vice) Nidya S Gutierrez (pro hac vice) ZIGLER LAW GROUP, LLC 308 S. Jefferson Street | Suite 333 Chicago, IL 60661 Tel: 312.673.8427 aaron@ziglerlawgroup.com larry@ziglerlawgroup.com nidya@ziglerlawgroup.com

Interim Class Counsel

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ORDER

The parties having stipulated to, and the Court finding good cause for, the following relief, it is now **ORDERED** that proceedings in the case are stayed, all existing deadlines are vacated, and the case is held in abeyance. If Plaintiffs have not filed a motion for preliminary approval by December 5, 2025, the parties must report to the Court the status of the Settlement Agreement and Plaintiffs' motion for preliminary approval.

Dated: October 21, 2025

Jamal N. Whitehead United States District Judge

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