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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ADRIANNE CLAYTON, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

LOUIS DEJOY, Postmaster General,
UNITED STATES POSTAL SERVICE,

Defendant.

Case No.: 2:24-cv-00759-CBM-BFM

STIPULATION TO STAY CASE

Complaint served: March 13, 2024
Current response date: July 26, 2024
Proposed response date: January 27, 2025

Hon. Consuelo B. Marshall
United States District Judge

1 IT IS HEREBY STIPULATED by and between Plaintiff and Defendant, through
2 their undersigned counsel, as follows:

3 1. On January 27, 2024, Plaintiff filed the Complaint, asserting a putative class
4 action claim for disparate impact discrimination under Title VII. ECF No. 1. The
5 Complaint was served on or around March 13, 2024.

6 2. On April 15, 2024, the parties filed a stipulation pursuant to L.R. 8-3 to
7 extend Defendant's deadline to respond to the Complaint from May 13, 2024, to June 12,
8 2024. ECF No. 12. On June 11, 2024, the parties filed a stipulation to extend
9 Defendant's deadline to respond to the Complaint by an additional fourteen (14) days,
10 from June 12, 2024, to June 26, 2024, because (1) undersigned defense counsel required
11 additional time to review the Complaint with the agency and prepare a response; (2) the
12 parties required additional time to complete their L.R. 7-3 conference on Defendant's
13 anticipated motion to dismiss; and (3) the parties were exploring informal resolution of
14 the Complaint. ECF No. 14. On June 12, 2024, the Court granted the extension. ECF
15 No. 15.

16 3. On June 24, 2024, the parties agreed to extend Defendant's deadline by an
17 additional thirty (30) days, from June 26, 2024, to July 26, 2024, because they were
18 continuing to explore informal resolution and wanted additional time to exchange
19 information for that purpose. ECF No. 16. On June 26, 2024, the Court granted the
20 extension. ECF No. 17

21 4. The parties have continued their meet and confer efforts, and recently
22 discovered that potential policy changes are forthcoming. These changes may assist the
23 parties in their settlement efforts, as they may limit or eliminate the issues in dispute in
24 this litigation. The parties agree it would be most efficient and preserve the parties' and
25 the Court's time and resources, to stay the case while the anticipated policy changes are
26 finalized, rather than proceed with litigation at this time.

27 WHEREFORE, for the foregoing reasons and subject to Court approval, the
28

1 parties agree that the case should be stayed for six months, and that Defendant's deadline
2 to respond to the Complaint should be extended to January 27, 2025. A proposed order
3 consistent with this request is attached hereto.

4
5 Dated: July 26, 2024

OSBORN LAW, P.C.

7 /s/ Daniel A. Osborn
8 DANIEL A. OSBORN, ESQ.

9 Attorney for Plaintiffs

10 Dated: July 26, 2024

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16 /s/ John C. Korevec *
17 MATTHEW J. SMOCK
18 JOHN C. KOREVEC
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19 Attorneys for Defendant

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* Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.