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Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16 VERONICA BRILL, *et al.*,

17 *Plaintiffs,*

18 v.

19 MICHAEL L. POSTLE, *et al.*,

20 *Defendants.*

Case No. 2:19-cv-02027-WBS-AC

**NOTICE OF PARTIAL SETTLEMENT
AND STIPULATION TO SET DATE FOR
MOTION TO WITHDRAW, EXTEND
TIME TO FILE SECOND AMENDED
COMPLAINT, AND VACATE STATUS
CONFERENCE AND STATUS
CONFERENCE REPORT DEADLINE**

21 Dept.: Courtroom 5
22 Judge: Hon. William B. Shubb

23 Complaint Filed: October 8, 2019
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1 Plaintiffs Veronica Brill, et al. (“Plaintiffs”), by and through counsel; Defendant King’s
2 Casino Management Corp., successor by merger with King’s Casino, LLC d/b/a The Saloon at
3 Stones Gambling Hall (“King’s Casino”), by and through counsel; and Defendant Justin Kuraitis
4 (“Kuraitis”), by and through counsel, hereby stipulate and agree as follows:

5 First, in the above-captioned case, Defendants King’s Casino and Kuraitis have settled with
6 the Plaintiffs set forth in Exhibit A. The Settlement Agreement has been executed by the settling
7 parties.

8 Second, the settling parties will file stipulations and proposed orders for dismissal as quickly
9 as possible and no later than September 18, 2020.

10 Third, Plaintiffs’ counsel have advised the non-settling Plaintiffs that they will seek to
11 withdraw as counsel. No non-settling Plaintiff has indicated an objection to withdrawal by
12 Plaintiffs’ counsel, although a number have simply been non-responsive to counsels’ entreaties.
13 Plaintiffs’ counsel intend to file a motion to withdraw by no later than September 11, 2020.

14 Fourth, Plaintiffs’ counsel seek to extend the time for the non-settling Plaintiffs to file a
15 Second Amended Complaint from September 11, 2020 to twenty (20) days after the Motion to
16 Withdraw as Counsel is ruled upon by the Court and to vacate the status conference currently
17 scheduled for October 13, 2020 and associated deadline for filing a status conference statement.
18 Defendants King’s Casino and Kuraitis do not oppose these requests so long as the extension of
19 time to file the Second Amended Complaint does not exceed the requested deadline.

20 Fifth, a court may extend the time for a party to file an amended complaint, continue the
21 deadline for filing a status conference statement, and vacate a status conference for good cause.
22 Fed. R. Civ. Pro. 6(b); E.D. Cal. L.R. 160; Judge Shubb Standard Information. In light of the
23 settlement and forthcoming dismissal of claims by a substantial majority of Plaintiffs and the
24 anticipated Motion to Withdraw as Counsel by Plaintiffs’ counsel, it is within the Court’s discretion
25 to grant the non-settling Plaintiffs an extension of time to file an amended complaint. And any
26 status conference in this matter should follow the determination of the parties remaining in the case
27 and the opportunity for non-settling Plaintiffs to appear in pro per or seek new counsel to file an
28 amended complaint, if desired, or to dismiss the action.

1 Accordingly, the parties stipulate and agree that Plaintiffs' counsels' Motion to Withdraw as
2 Counsel will be filed by no later than September 11, 2020, Plaintiffs' time to file their Second
3 Amended Complaint shall be extended from September 11, 2020, to no more than twenty (20) days
4 after the Court's order on the Motion to Withdraw as Counsel, and the initial status conference
5 scheduled for October 13, 2020 and the associated deadline for filing a status conference statement
6 shall be vacated.

7 SO STIPULATED.

8 Dated: September 9, 2020

BOIES SCHILLER FLEXNER LLP

9 By: /s/ Mark C Mao

10 Mark C. Mao

11 Boies Schiller Flexner LLP

12 *Attorneys for Defendant King's Casino
Management Corp.*

13 Dated: September 9, 2020

THE VERSTANDIG LAW FIRM, LLC

14 By: /s/ Maurice B. VerStandig (as authorized on 9/9/20)

15 Maurice B. VerStandig (pro hac vice)

16 The VerStandig Law Firm, LLC

17 *Attorneys for Plaintiffs*

18 Dated: September 9, 2020

LAW OFFICES OF RICHARD PACHTER

19 By: /s/ Richard Pachter (as authorized on 9/9/20)

20 Richard Pachter

21 Law Offices of Richard Pachter

22 *Attorneys for Defendant Kuraitis*

23 **[PROPOSED] ORDER**

24 The Court, having considered the Notice of Partial Settlement and Stipulation to Set Date
25 for Motion to Withdraw, to Extend the Time to File Second Amended Complaint, and Vacate
26 Status Conference and Status Conference Report Deadline, and finding good cause therefore,
27 hereby orders:

28 Plaintiffs' counsel shall file a Motion to Withdraw as Counsel by September 11, 2020.

Plaintiffs' time to file their Second Amended Complaint shall be extended from September
11, 2020, to twenty (20) days after the Court's order on the Motion to Withdraw as Counsel.

1 The initial status conference scheduled for October 13, 2020 and the associated deadline for
2 filing a status conference statement are vacated.

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4 Dated: _____

William B. Shubb
United States District Judge

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Exhibit A: List of Currently Settling Plaintiffs

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- 2 • Aaron McCormack
- 3 • Andrew Hernandez
- 4 • Andrew Lok
- 5 • Anthony ‘Tony’ Giglini
- 6 • Ariel Reid
- 7 • Arish S. Nat
- 8 • Aronn Solis
- 9 • Benjamin “Ehb” Teng
- 10 • Billy Joe Messimer
- 11 • Blake Alexander Kraft
- 12 • Brad Kraft
- 13 • Brandon Steadman
- 14 • Brennen Alexander Cook
- 15 • Brian Michael Raasch
- 16 • Brian Olson
- 17 • Bryant Miller
- 18 • Cameron Smith
- 19 • Carlos Welch
- 20 • Corey Caspers
- 21 • Cris ‘AC’ Manipula
- 22 • Dale Menghe
- 23 • Dan Mayer
- 24 • Darrell Steed
- 25 • Dave Crittenton
- 26 • David Duarte
- 27 • Derick Cole
- 28 • Dustin McCarthy

- 1 • Eli James
- 2 • Harlan Karnofsky
- 3 • Harun Unai Begic
- 4 • Hawnlay Swen
- 5 • Hung Sam
- 6 • Idris M. Yonisi
- 7 • James John O'Connor
- 8 • Jason Markwith
- 9 • Jeffrey Sluzinski
- 10 • Jon Turovitz
- 11 • Jordan Diamond
- 12 • Joshua Whitesell
- 13 • Kathy Stahl
- 14 • Matthew Gouge
- 15 • Michael Phonesavanh Rasphone
- 16 • Michael Rojas
- 17 • Mike Nelson
- 18 • Nathan Pelkey
- 19 • Navroop 'Nav' Shergill
- 20 • Nicholas Colvin
- 21 • Nicholaus Wooderson
- 22 • Paras Singh
- 23 • Patrick Laffey
- 24 • Paul 'Bobby' Lopez
- 25 • Ryan Jaconetti
- 26 • Scott Schlein
- 27 • Scott Sorenson
- 28 • Shane Gonzalez

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- Taylor Carroll
- Thomas Morris III
- Trenton Sidener
- Tyler Denson
- Zeev Malkin