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10 *Attorneys for Defendants WCO Spectrum LLC,*
SCH LLC, Academia Spectrum LLC,
11 *Karen Winnick, Carl Katerndahl,*
Andreas Bitzarakis, and Tyler Kratz
12

13 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

14 T-MOBILE US, INC. *et al.*

Civil Action No. 2:23-4347-DMG-E

15
16 Plaintiffs,

**JOINT STIPULATION FOR STAY
OF PROCEEDINGS AND
EXTENSION OF TIME FOR
DEFENDANTS TO ANSWER THE
COMPLAINT WHILE THE
PARTIES CONDUCT PRIVATE
MEDIATION**

17 vs.

18 WCO SPECTRUM LLC *et al.*,

19 Defendants.
20
21

**Filed Concurrently With
[Proposed] Order**

Hon. Dolly M. Gee
United States Chief District Judge

1 Plaintiffs T-Mobile US, Inc., Clearwire Spectrum Holdings LLC, Clearwire
2 Spectrum Holdings II, LLC, Clearwire Spectrum Holdings III, LLC, Fixed Wireless
3 Holdings, NSAC LLC, TDI Acquisition Sub LLC, and WBSY Licensing, LLC
4 (collectively, “Plaintiffs”), and Defendants WCO Spectrum LLC, SCH LLC,
5 Academia Spectrum, LLC, Karen Winnick in her dual capacities as executrix of the
6 Estate of Gary Winnick and Trustee of the GKW Trust, Carl Katerndahl, Andreas
7 Bitzarakis, and Tyler Kratz (collectively, “Defendants”) (collectively with Plaintiffs,
8 the “Parties”), by and through their respective undersigned counsel, hereby
9 respectfully request and move that the Court extend Defendants’ deadline to answer
10 the Complaint and suspend proceedings in the above-captioned case until such time
11 as the Parties are able to complete a private mediation of this matter. Good cause
12 supports the requested stay of proceedings, as follows:

13 1. Plaintiffs filed their Complaint in this matter on June 2, 2023. (ECF
14 No. 1);

15 2. Defendants subsequently moved to dismiss the Complaint in its entirety
16 on March 6, 2024. (ECF No. 78);

17 3. On October 22, 2024, the Court denied Defendants’ motion to dismiss
18 and directed Defendants to file their answer by November 12, 2024. (ECF No. 117);

19 4. In the spirit of good faith and cooperation, the parties have subsequently
20 agreed to conduct a private mediation of this matter and are committed to a
21 productive and fruitful mediation;

1 5. Good cause exists for a stay of proceedings to facilitate mediation
2 because the requested stay will enable the Parties to focus and commit their time and
3 resources to the mediation and potential settlement, and will minimize the
4 expenditure of judicial resources;

5 6. The Parties agree that the current November 12, 2024 deadline for
6 Defendants to Answer the Complaint should be extended and this proceeding stayed
7 until such time as private mediation can be completed.

8 NOW, THEREFORE, THE PARTIES RESPECTFULLY MOVE THE
9 COURT for an order staying proceedings, as follows:

- 10 • The deadline for Defendants to file their Answer to the Complaint shall
11 be extended from November 12, 2024 until such time as the Parties can
12 schedule and complete private mediation of this matter.
- 13 • The Parties shall complete private mediation and file a joint status
14 report regarding mediation no later than February 3, 2025.

1 Dated: November 8, 2024

Respectfully submitted,

3 *s/ Maurice R. Mitts*

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14 *s/ Kathryn E. Hoover*

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Attorneys for Plaintiffs

1 **ATTESTATION**

2 The filer, pursuant to L.R. 5-4.3.4(a)(2), hereby certifies that all other
3 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
4 content and have authorized the filing.

5
6 Dated: November 8, 2024

s/ Maurice R. Mitts

Maurice R. Mitts