IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 25-cv-02907-GPG-STV

CYNTHIA MONTOYA and WILLIAM "WIL" PERALTA,

Plaintiffs,

v.

CHARACTER TECHNOLOGIES, INC.,
NOAM SHAZEER,
DANIEL DE FREITAS ADIWARSANA,
GOOGLE LLC, and
ALPHABET INC.,

Defendants.

UNOPPOSED JOINT MOTION TO STAY CASE AND VACATE SCHEDULING CONFERENCE AND DEADLINES

Plaintiffs Cynthia Montoya and William "Wil" Peralta ("Plaintiffs") and Defendants Character Technologies, Inc., Noam Shazeer, Daniel De Freitas Adiwarsana, Google LLC, and Alphabet, Inc. ("Defendants" and collectively, the "Parties"), by and through undersigned counsel, hereby request that the Court stay the case, vacate the January 21, 2026 scheduling conference, and vacate all other deadlines pending the finalization of a settlement agreement between the parties.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 7.1(a)

In accordance with D.C.Colo.L.Civ.R. 7.1(a)**,** counsel for both parties have conferred regarding this Motion. Defendants and Plaintiffs make this Motion jointly, and no party opposes this Motion.

MOTION

1. Plaintiffs and Defendants have reached an agreement in principle to resolve the issues raised in this lawsuit.

2. The Parties are negotiating the terms of a final written agreement resulting in the dismissal of this action. However, the parties require additional time to finalize a settlement agreement.

3. The Parties have conferred and agreed to stay the case and vacate all pending case deadlines while the written agreement is being negotiated.

4. The Parties further request that the Court set an April 2, 2026 deadline for the Parties to submit a joint status report if a notice of dismissal has not been filed by that date.

5. The Parties jointly move this Court for the desired relief and no party will be prejudiced by the stay.

WHEREFORE, the Parties respectfully request that this Court enter an order staying the case, vacating the upcoming scheduling conference, and vacating all upcoming deadlines. The parties further request that the Court set an April 2, 2026 deadline for the parties to submit a joint status report if a notice of dismissal has not been filed before that date.

Dated: January 6, 2026

Respectfully submitted,

/s/ Radu A. Letutiu

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 6, 2026, a true and correct copy of the foregoing **Unopposed Joint Motion to Stay Case and Vacate Scheduling Conference and Deadlines** was filed and served upon all counsel of record via ECF-Pacer.

Pursuant to D.C.Colo.L.Civ.R. 6.1(c), the undersigned certifies that a copy of this Motion has been served contemporaneously on the following Parties:

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