

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KARISSA VACKER, MARK BOYETT,)
BRIAN LARSON, IRON TOWER PRESS, INC.)
and VAUGHN HEPPNER,)

Plaintiffs,)

v.)

ELEVEN LABS, INC.,)

Defendant.)

C.A. No. 24-987 (RGA)

JOINT STIPULATION AND [PROPOSED] ORDER TO STAY PROCEEDINGS

Plaintiffs and Defendant Eleven Labs, Inc. respectfully submit this Joint Stipulation and Proposed Order to continue the stay of these proceedings.

WHEREAS, on August 18, 2025, the parties engaged in a mediation;

WHEREAS, as a result of this mediation, the Parties reached a settlement agreement and signed a term sheet;

WHEREAS, on August 20, 2025, this Court granted the Parties' Stipulation to Stay Proceedings until September 18, 2025;

WHEREAS, on September 18, 2025, this Court granted the Parties' Stipulation to Stay Proceedings until October 2, 2025; and

WHEREAS, the Parties have executed the Long Form Agreement with an effective date of September 30, 2025;

NOW, THEREFORE, IT IS HEREBY STIPULATED by the parties, subject to the Court's approval, that:

1. These proceedings shall remain stayed while the performance of certain settlement terms is pending.

2. Once performance of certain terms of the settlement is complete, the Parties shall file a Stipulation of Dismissal of the entire action with Prejudice.
3. To the extent a Stipulation of Dismissal is not filed on or before November 6, 2025, the parties shall file a joint status report informing the Court on the status of settlement.

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October 3, 2025

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SO ORDERED this 6th day of October, 2025.

/s/ Richard G. Andrews

United States District Court Judge