

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

N.P., individually and on behalf of all others
similarly situated,

Plaintiff,

v.

STANDARD INNOVATION (US) CORP., d/b/a
WE-VIBE, a Delaware corporation,

Defendant.

Case No. 1:16-cv-8655

JOINT MOTION FOR A 60-DAY STAY OF PROCEEDINGS

Plaintiff N.P. (“Plaintiff”) and Defendant Standard Innovation (US) Corp. (“Standard Innovation”) (collectively “the Parties”), respectfully request a 60-day stay of this litigation, until January 27, 2017. In support of the instant Motion, the Parties jointly state as follows:

On November 22, 2016, the Parties attended a full-day mediation before the Honorable Morton Denlow (ret.) of JAMS, Chicago. With Judge Denlow’s assistance and after several arms’ length discussions, the Parties executed a Memorandum of Understanding (“MOU”) regarding agreed terms for settlement of Plaintiff’s claims on behalf of herself and a putative settlement class.

The Parties are now in the process of drafting a written Class Action Settlement Agreement and the other necessary documents (*e.g.*, proposed notices), which Plaintiff will formally present to the Court by filing a motion for preliminary approval of the settlement. The

Parties anticipate that they will complete and sign the Settlement Agreement within thirty days and that Plaintiff will submit a motion to the Court for preliminary approval shortly thereafter.

On September 23, 2016, Standard Innovation moved for an extension of time to answer the Complaint. (ECF No. 6.) On September 28, 2016, the Court granted that motion, making November 7, 2016 Standard Innovation's deadline for responsive pleadings. (ECF No. 10.) On November 2, 2016, Standard Innovation, with Plaintiff's agreement, moved for a further extension, on the ground that the Parties were engaged in settlement discussions. (ECF No. 12.) The Court granted that motion on November 3, 2016, setting Standard Innovation's new deadline for December 7, 2016.

In light of the Parties' successful conclusion of their settlement discussions, and taking into account potential scheduling disruptions that may be caused by the upcoming holidays, the Parties hereby request a 60-day stay of this litigation, until January 27, 2016, so that they can prepare the settlement papers and submit them to the Court.

WHEREFORE, Plaintiff N.P., individually and on behalf of a putative class, and Defendant Standard Innovation (US) Corp. jointly request that the Court enter an order staying this case, including all deadlines, hearings and conferences, for 60 days.

Dated: November 29, 2016

/s/ Eve-Lynn J. Rapp
BENJAMIN H. RICHMAN
brichman@edelson.com
BENJAMIN THOMASSEN
bthomassen@edelson.com
Edelson PC
350 North LaSalle Street, Suite 1300
Chicago, IL 60654
312.589.6370 (phone)
312.589.6378 (fax)

Respectfully submitted:

/s/ Nathan T. Newman
NATHAN T. NEWMAN
nathan.newman@tuckerellis.com
Tucker Ellis LLP
Willis Tower
233 South Wacker Drive, Suite 6950
Chicago, IL 60606
312.624.6300 (phone)
312.624.6309 (fax)

EVE-LYNN J. RAPP
erapp@edelson.com
123 Townsend, Suite 100
San Francisco, CA 94107
415.234.5262 (phone)
415.373.9435 (fax)

Counsel for Plaintiff N.P.

NEIL K. GILMAN
ngilman@hunton.com
Hunton & Williams LLP
2200 Pennsylvania Avenue, NW
Washington, DC 20037
202.955.1500 (phone)
202.862.3629 (fax)

THOMAS R. WASKOM
twaskom@hunton.com
Hunton & Williams LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219
804.788.8403 (phone)
804.343.4868 (fax)

*Counsel for Defendant Standard Innovation
(US) Corp.*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2016, the foregoing was electronically filed with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

/s/ Nathan T. Newman