

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

**DONALD PUCKETT**, an Oregon resident, on behalf of himself and all similarly situated persons, **PATRICK KAVANAGH**, a Washington resident, on behalf of himself and all similarly situated persons, **THERESA CORDERO**, a California resident, on behalf of herself and all similarly situated persons,

Plaintiffs,

v.

**MY PILLOW, INC.**,

Defendant.

Court File No. 17-00029-MJD-BRT

**STIPULATION TO STAY FURTHER PROCEEDINGS**

Plaintiffs Donald Puckett, Patrick, Kavanagh, and Theresa Cordero (“Plaintiffs”) and Defendant My Pillow, Inc. (“Defendant”), through their respective counsel, and subject to the approval of this Court, hereby stipulate as follows:

1. This case was originally filed in this Court on January 4, 2017.
2. The parties have reached an agreement in principle to resolve the case.
3. Plaintiffs and Defendant continue to move toward finalizing the settlement agreement and seeking to effectuate preliminary and final approval in connection with related cases filed in other jurisdictions.

4. Plaintiffs and Defendant have agreed to present the settlement agreement for approval in the *Amiri, et al. v. My Pillow, Inc.* (Case No. CIVDS1606479) matter currently pending in the Superior Court for the State of California.

5. Plaintiffs and Defendant wish to stay all further action in this proceeding in until final approval has been obtained and related appeals, if any, have concluded.

6. Accordingly, Plaintiffs and Defendant jointly request that these proceedings be stayed indefinitely, subject to the right of any party to terminate the stay upon thirty (30) days written notice to all counsel of record.

For the foregoing reasons, the parties respectfully request that the Court enter an Order staying all further proceedings in the above referenced matter until February 28, 2018.

SO STIPULATED.

Dated: September 7, 2017

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

By: s/ Robert K. Shelquist

Robert K. Shelquist, #21310X

Rebecca A. Peterson, #392663

100 South Washington Avenue, Suite 2200

Minneapolis, Minnesota 55401

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

[rkshelquist@locklaw.com](mailto:rkshelquist@locklaw.com)

[rapeterson@locklaw.com](mailto:rapeterson@locklaw.com)

Peter J. Bezek, California Bar No. 102310  
Robert A. Curtis, California Bar No. 203870  
Kevin D. Gamarnik, California Bar No. 273445  
[*PRO HAC VICE*]  
FOLEY BEZEK BEHLE & CURTIS LLP  
15 West Carrillo Street  
Santa Barbara, California 93101  
Telephone: (805) 962-9495  
Facsimile: (805) 962-0722  
[pbezek@foleybezek.com](mailto:pbezek@foleybezek.com)  
[rcurtis@foleybezek.com](mailto:rcurtis@foleybezek.com)  
[kgamarnik@foleybezek.com](mailto:kgamarnik@foleybezek.com)

Rick Klingbeil, Oregon Bar No. 933326  
[*PRO HAC VICE*]  
107 SE Washington St., Ste. 233  
Portland, Oregon 97214  
Telephone: 503-473-8565  
Facsimile: 503-427-9001  
[rick@klingbeil-law.com](mailto:rick@klingbeil-law.com)

Brady Mertz, Oregon Bar No. 970814  
[*PRO HAC VICE*]  
BRADY MERTZ, PC  
2285 Liberty Street NE  
Salem, OR 97301  
Telephone : (503) 385-0121  
Facsimile: (503) 375-2218  
[brady@bradymertz.com](mailto:brady@bradymertz.com)

*Attorneys for Plaintiffs*

Dated: September 7, 2017

FREDRIKSON & BYRON, P.A.

By: s/ Todd Wind

Todd Wind (#0196514)

Leah C. Janus (#0337365)

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

Telephone: 612.492.7000

Facsimile: 612.492.7077

[twind@fredlaw.com](mailto:twind@fredlaw.com)

[ljanus@fredlaw.com](mailto:ljanus@fredlaw.com)

*Attorneys for Defendant*