

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLORADO**

Civil Action No. 1:24-cv-03218-CNS-CYC

Tim Peterson, on behalf of himself and all others similarly situated,

Plaintiff,

v.

Nordvpn S.A., and Tefincom S.A. d/b/a NordVPN,

Defendants.

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**UNOPPOSED MOTION REQUESTING TO STAY PROCEEDINGS PENDING  
SETTLEMENT**

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Pursuant to D.C.COLO.LCivR 7.1(c) and 6.1(a), Plaintiff Tim Peterson and Defendants NordVPN S.A. and Tefincom S.A. d/b/a NordVPN (“Nord”) (collectively, the “Parties”) jointly move to stay all proceedings, including all deadlines and scheduled events, in this matter for a period of ninety (90) days while the Parties finalize a settlement agreement. The Parties have conferred and stipulate as follows:

1. On November 19, 2024, Plaintiff filed the putative Class Action Complaint in this matter. ECF No. 1.

2. The case is currently in discovery, and is currently governed by the Court’s Scheduling Order, as amended. ECF Nos. 59, 62, 65.

3. The Parties participated in a full-day mediation before Marc Isserles, Esq. on April 14, 2026.

4. During that mediation, the Parties reached an agreement in principle to resolve this matter.

5. The agreement was memorialized in a Memorandum of Understanding executed on April 14, 2026, which sets forth the material terms of the settlement and establishes a timeline for

completion of the settlement process. Pursuant to that agreement, the Parties intend to file a motion for preliminary approval of the settlement within ninety (90) days of the mediation, i.e., by July 13, 2026.

6. The Parties are currently working diligently to finalize the terms of a comprehensive settlement agreement and supporting documents necessary for preliminary approval, including class notice materials and related filings.

7. In light of the Parties' agreement in principle and ongoing efforts to finalize settlement, continuing litigation—including discovery, motion practice, and other pretrial deadlines—would impose unnecessary burden and expense on the Parties and the Court.

8. A temporary stay of all proceedings will conserve judicial resources and allow the Parties to focus on finalizing the settlement.

9. The Parties therefore respectfully request that the Court stay all proceedings in this matter for ninety (90) days, which will allow substantial progress toward finalizing the settlement and, if necessary, position the Parties to seek a brief extension or provide a status update prior to the July 13, 2026 preliminary approval deadline.

10. The Parties will promptly notify the Court upon execution of a final settlement agreement and will thereafter submit appropriate filings, including any motion for preliminary approval, if applicable.

11. If the Parties are unable to finalize the settlement within the requested stay period, they will submit a joint status update to the Court prior to the expiration of the stay.

## CONCLUSION

For the foregoing reasons, the Parties respectfully request that the Court stay all proceedings, including all deadlines and scheduled events, in this matter for ninety (90) days, up to and including July 27, 2026, and order the Parties to file a joint status report at the conclusion of that period.

**IT IS SO STIPULATED.**

Respectfully Submitted,

Dated: April 28, 2026

**WITTELS MCINTURFF PALIKOVIC**

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Dated: April 28, 2026

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**[PROPOSED] ORDER REQUESTING TO STAY PROCEEDINGS PENDING  
SETTLEMENT**

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This matter is before the Court on the Joint Stipulation Requesting to Stay Proceedings Pending Settlement (“Joint Stipulation”) filed on April 28, 2026.

The Court, having considered the relief requested, hereby GRANTS the Joint Stipulation and ORDERS that all proceedings in this matter are stayed for ninety (90) days, up to and including July 27, 2026. The Parties shall file a joint status report no later than July 27, 2026.

It is SO ORDERED.

Dated: \_\_\_\_\_, 2026

BY THE COURT

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The Honorable Judge Cyrus Y. Chung  
United States Magistrate Judge