

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RENE TIO,
on behalf of himself and all others similarly
situated,

Plaintiff,

v.

NORDVPN S.A., AND TEFINCOM S.A.
D/B/A NORDVPN,

Defendants.

Civil Case No. 1:25-cv-13374-ADB

**JOINT STIPULATION AND [PROPOSED] ORDER REQUESTING TO STAY
PROCEEDINGS PENDING SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 6(b) and L.R., D. Mass 40.3, Plaintiff Rene Tio and Defendants NordVPN S.A. and Tefincom S.A. d/b/a NordVPN (“Nord”) (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly stipulate and respectfully request that the Court stay all proceedings in this matter for ninety (90) days while the Parties finalize a settlement agreement. In support, the Parties state as follows:

1. On November 11, 2025, Plaintiff filed the putative class action complaint in this matter. ECF No. 1.
2. On February 13, 2026, Defendants filed a motion to dismiss the complaint. That motion has been fully briefed: Plaintiff filed an opposition to Defendants’ motion to dismiss on March 20, 2026, and Defendants filed their reply in further support of the motion to dismiss on April 2, 2026.
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 enter an order staying all proceedings in this matter for ninety (90) days, through July 27, 2026, and directing the Parties to submit a joint status report on or before that date.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: April 28, 2026

WITTELS MCINTURFF PALIKOVIC

By: /s/ J. Burkett McInturff

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Dated: April 28, 2026

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By: /s/ Sara Haven

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*Counsel for Defendants Nordvyn S.A. and
Tefincom S.A.*

[PROPOSED] ORDER

1. All proceedings in this matter are stayed until July 27, 2026.
2. The Parties shall submit a joint status report on or before _____.

Dated: _____

Hon. Allison D. Burroughs
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that this document was electronically filed with the Clerk of Court on April 28, 2026 through the CM/ECF system, which will serve notice on all counsel of record.

/s/ Sara Haven

Sara Haven

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**DECLARATION OF SARA HAVEN IN SUPPORT OF JOINT STIPULATION AND
[PROPOSED] ORDER REQUESTING TO STAY PROCEEDINGS PENDING
SETTLEMENT**

I, Sara Haven, declare as follows:

1. I am counsel of record for Defendants NordVPN S.A. and Tefincom S.A. d/b/a NordVPN in the above-captioned action. I submit this Declaration in support of the Parties' Joint Stipulation to Stay Proceedings Pending Settlement. I have personal knowledge of the facts set forth herein.

2. The Parties participated in a full-day mediation before Marc Isserles, Esq. on April 14, 2026, and on that date reached an agreement in principle to resolve this matter on a class-wide basis. Counsel for the Parties have conferred regarding the relief requested in the Joint Stipulation.

3. The Parties require approximately ninety (90) days to finalize the settlement agreement and prepare the supporting materials necessary for a motion for preliminary approval.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Charlottesville, Virginia on April 28, 2026.

/s/ Sara Haven
Sara Haven

CERTIFICATE OF SERVICE

I hereby certify that this document was electronically filed with the Clerk of Court on April 28, 2026 through the CM/ECF system, which will serve notice on all counsel of record.

/s/ Sara Haven

Sara Haven