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13 *Attorneys for Defendant*
14 *Fashion Nova, Inc.*

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 CHROME HEARTS LLC, a Delaware
19 Limited Liability Company,

20 Plaintiff,

21 vs.
22

23 FASHION NOVA, INC. a California
24 Corporation; and DOES 1-10, inclusive,

25 Defendants.
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CASE NO.: 2:20-cv-07068-FMO-PLA

27 **NOTICE OF SETTLEMENT AND**
28 **JOINT STIPULATION TO STAY ALL**
DEADLINES FOR (30) DAYS
PENDING SETTLEMENT

Honorable Fernando M. Olguin

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

1 PLEASE TAKE NOTICE that Plaintiff Chrome Hearts LLC (“Chrome Hearts”
2 or “Plaintiff”) and Defendant Fashion Nova, Inc. (“Fashion Nova” or “Defendant”)
3 (collectively, the “Parties”) reached a settlement in principal and working to draft a
4 written agreement that, *when fully executed*, would fully resolve the above-entitled
5 action. The Parties anticipate that a written settlement agreement will be finalized, fully
6 executed, and a Stipulation of Dismissal of this Action filed within thirty (30) days of
7 the filing of this Notice.

8 Based on the foregoing, and in the interests of conserving the resources of the
9 Court, the Parties request that all pending deadlines in this Action be stayed for thirty
10 (30) days in order to allow the Parties sufficient time to finalize and execute a written
11 settlement agreement. The Parties further request that the Court set a Status Conference
12 regarding settlement after thirty (30) days on a date convenient to the Court, in the event
13 a Stipulation of Dismissal has not been filed before then and further proceedings in this
14 action may be necessary.

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16 **IT IS SO STIPULATED.**

17
18 Dated: January 14, 2021

/s/ Mark S. Zhai
Brent H. Blakely
Mark S. Zhai
Attorneys for Plaintiff
CHROME HEARTS LLC

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22 Dated: January 14, 2021

/s/ Staci Jennifer Riordan
Staci Jennifer Riordan
Ryan C.C. Duckett
Attorneys for Defendant
FASHION NOVA, INC.

ATTESTATION RE SIGNATORIES

I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 14, 2021

By: /s/ Mark S. Zhai
Mark S. Zhai

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