

1 DAVID A. STEINBERG (SBN 130593)
MARC E. MAYER (SBN 190969)
2 EMILY F. EVITT (SBN 261491)
MITCHELL SILBERBERG & KNUPP LLP
3 2049 Century Park East, 18th Floor
Los Angeles, CA 90067-3120
4 Telephone: (310) 312-2000
Facsimile: (310) 312-3100

5 Attorneys for Defendants
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 SAN DIEGO DIVISION

11 JANE DOE NOS. 1 through 50,
inclusive, individuals,

12 Plaintiffs,

13 v.
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15 MG FREESITES, LTD., dba
"PORNHUB," a foreign entity;
MINDGEEK S.A.R.L. a foreign entity;
16 MINDGEEK USA INCORPORATED,
a Delaware corporation; 9219-1568
17 QUEBEC, INC., dba "MindGeek," a
foreign entity; and MG BILLING US
18 CORP., dba "Probiller.com," a
Delaware corporation,

19 Defendants.
20

CASE NO. 3:20-CV-02440-WQH-KSC

Judicial Officer: William Q. Hayes

**JOINT MOTION TO SUSPEND
PROCEEDINGS FOR 30 DAYS**

[(PROPOSED) ORDER SUBMITTED
CONCURRENTLY HEREWITH]

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD HEREIN:**

3 By this joint, stipulated motion, Plaintiffs Jane Doe Nos. 1-50, and
4 Defendants MG Freesites Ltd, MindGeek S.à.r.l., MindGeek USA Incorporated,
5 9219-1568 Quebec Inc., and MG Billing US Corp. (collectively the “Parties”),
6 through their counsel of record, jointly request that the Court suspend all
7 proceedings in this action for 30 days.

8 This request is based on the following facts:

- 9 1. On or about December 15, 2020, Plaintiffs filed their original
10 Complaint in this action. (Dkt. No. 1.)
- 11 2. On or about April 1, 2021, Plaintiffs filed their First Amended
12 Complaint. (Dkt. No. 23.)
- 13 3. On or about April 23, 2021, Defendants filed a Motion for a Stay of
14 Proceedings Pursuant to 18. U.S.C. § 1595(b). (Dkt. No. 28.) The Motion to Stay
15 has been fully briefed; no decision has been issued.
- 16 4. On or about May 3, 2021, Defendants filed a Motion to Strike Pursuant
17 to FRCP 12(f). (Dkt. No. 29.) The Motion to Strike has been fully briefed; no
18 decision has been issued.
- 19 5. The Parties have had preliminary communications concerning the
20 possible resolution of this action (including potential mediation or other alternative
21 dispute resolution). In order to facilitate such discussions, the Parties have agreed to
22 request a brief suspension of all proceedings, subject to the Court’s approval.
- 23 6. This is the Parties’ first request for such a suspension, and the Parties
24 agree that neither Plaintiffs nor Defendants shall be prejudiced thereby.

1 Based on the foregoing, the Parties jointly request that the Court suspend all
2 proceedings in the action for 30 days, including but not limited to ruling on the
3 currently pending Motion to Stay and Motion to Strike.

4
5 DATED: JULY 7, 2021

RESPECTFULLY SUBMITTED,

6 DAVID A. STEINBERG
7 MARC E. MAYER
8 EMILY F. EVITT
9 MITCHELL SILBERBERG & KNUPP LLP

10 By: /s/ Marc E. Mayer

David A. Steinberg

Marc E. Mayer

Emily F. Evitt

Attorneys for Defendants

11
12 DATED: JULY 7, 2021

13 BRIAN M. HOLM
14 HOLM LAW GROUP, PC

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16 By: 
17 Brian M. Holm

Attorneys for Plaintiffs

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