IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION

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SOSA ENTERTAINMENT LLC, Plaintiff,))))	Civil Action No. 2:19-cv-00843
V.	Ś	
SPOTIFY AB, a Swedish Corporation; Spotify USA INC., a Delaware Corporation; SPOTIFY LIMITED, a United Kingdom Corporation; and SPOTIFY TECHNOLOGY S.A., a Luxembourg Corporation, Defendants.	·))))))))	
SPOTIFY AB, and SPOTIFY USA, INC.,		
Counterclaim and Third Party Plaintiffs,		
v.		
SOSA ENTERTAINMENT LLC and JAKE P. NOCH,		
Counterclaim Defendants and Third Party Defendant.		

JOINT MOTION TO STAY

Plaintiff/Counterclaim Defendant Sosa Entertainment LLC and Counterclaim/Third-Party Defendant Jake P. Noch, and Defendants/Counterclaim and Third-Party Plaintiffs Spotify AB and Spotify USA, Inc. hereby jointly move for an order staying this proceeding, including discovery and all deadlines, for a period of sixty (60) days, in order to allow the parties to attempt to negotiate a resolution of this matter. The parties have recently made progress towards a potential resolution of the litigation. Rather than continuing to expend time and resources litigating the case, the parties propose a brief, sixty (60) day stay of the proceeding in order to focus on attempting to resolve this matter. The parties assert that a stay is appropriate in order to conserve the parties' and the Court's time and resources by avoiding litigation that will be unnecessary if the case is resolved.

The parties propose filing a joint status report within sixty (60) days of the entry of an order staying the case. In addition, the parties will promptly advise the Court if a settlement is reached or if negotiations reach an impasse prior to the deadline to file a status report.

CONCLUSION

Under the circumstances of this case, the Court should stay this matter, including all discovery and deadlines, for sixty (60) days in order to permit to attempt to resolve the litigation and avoid unnecessarily wasting the parties' and the Court's time and resources.

Date: January 13, 2021

Respectfully submitted,

<u>s/ Richard Gora</u> Richard Gora (admitted pro hac vice)

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