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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 GAS DRAWLS LLC,

15 Plaintiff,

16 v.

17 WHALECO, INC., *et al.*,

18 Defendants.
19
20

Case No.: 2:25-cv-07425-SB-BFM

NOTICE OF SETTLEMENT

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE per Section 1(d) of this Court’s Standing Order that the parties, after conducting a settlement conference with Judge Andrew J. Guilford (ret.) and thereafter engaging in ongoing settlement discussion with his involvement, have reached a settlement in principle to resolve all claims related to the action. The parties will today review a draft of a written agreement and anticipate being in a position to dismiss this case in full within 45 days.

There are currently pending a number of motions before Your Honor and Magistrate Judge Brianna Fuller Mircheff. And tomorrow, a Court holiday, is the final day to file additional motions in order to be timely heard by this Court. Plaintiff contemplated filing two motions tomorrow. As to each of these filed or contemplated motions, the “parties are engaged in serious negotiations that appear likely to resolve the case” and that resolution, if consummated, would moot these motions. *See* Standing Order, §1(d). Per § 8(f) of that Order, the oral arguments are currently scheduled before Judge Mircheff on June 23, 2026 and July 7, 2026 and before this Court on July 10, 2026. The hearings on Plaintiff’s contemplated motions would be July 17, 2026. The parties respectfully request that the current hearing dates and deadlines be vacated and the parties be given 45 days to finalize the settlement and dismiss in full this action.

To the extent the Court is disinclined to grant the above, the parties respectfully request that the Court allow until Monday, June 22, 2026 to file any motions. Those motions will be set for the same July 17, 2026 hearing date as they would have been set if filed tomorrow and the parties will agree to shorten their deadline to file reply briefs by three days to allow for this extension.

Respectfully submitted,

Date: June 18, 2026

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs, Esq.
Andres Navarro, Esq.
DONIGER / BURROUGHS
Attorneys for Plaintiff

Date: June 18, 2026

By: /s/ Hans Mayer
Hans Mayer, Esq.
Matt Bellinger, Esq.
KNOBBE MARTENS
Attorneys for Defendant

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.

By: /s/ Andres Navarro
Andres Navarro