

1 Timothy W. Moppin (SBN 133363)  
Attorney at Law  
2 2015 Junction Avenue  
El Cerrito, CA 94530  
3 Telephone: (510) 232-0442  
Email: timmoppin@yahoo.com  
4 timmoppin@aol.com

5 Richard M. Nichols (SBN 166638)  
876 Arlene Way  
6 Novato, CA 94530  
Telephone: (415) 314-0066  
7 Email: Rnicholspc@gmail.com

8 Attorneys for Plaintiff  
HOPE SOLO  
9  
10 [Additional Counsel on signature  
page]

SEYFARTH SHAW LLP  
Ellen E. McLaughlin (IL 6181045) (admitted pro hac vice)  
emclaughlin@seyfarth.com  
Brian M. Stolzenbach (IL6273113) (admitted pro hac vice)  
bstolzenbach@seyfarth.com  
Sharilee Kempa Smentek (IL6277773)  
(admitted pro hac vice)  
ssmentek@seyfarth.com  
Cheryl A. Luce (IL 6313386) (admitted pro hac vice)  
cluce@seyfarth.com  
233 S. Wacker Drive, Suite 8000  
Chicago, Illinois 60606  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

Kyllan B. Kershaw (GA744304) (admitted pro hac vice)  
kkershaw@seyfarth.com  
Seyfarth Shaw LLP  
1075 Peachtree Street, NE, Ste. 2500  
Atlanta, GA 30309  
Telephone: 404-885-6766

SEYFARTH SHAW LLP  
Giovanna A. Ferrari (SBN 229871)  
gferrari@seyfarth.com  
Chantelle C. Egan (SBN 257938)  
cegan@seyfarth.com  
560 Mission Street, 31st Floor  
San Francisco, California 94105  
Telephone: (415) 397-2823  
Facsimile: (415) 397-8549

Attorneys for Defendant  
UNITED STATES SOCCER FEDERATION

19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN FRANCISCO DIVISION**

22 HOPE SOLO,  
23  
24 Plaintiff,  
25  
26 v.  
27 UNITED STATES SOCCER FEDERATION,  
28  
Defendant.

Case No. 3:18-CV-05215 JD

**JOINT STIPULATION TO STAY  
PROCEEDINGS FOR 90 DAYS AND  
[PROPOSED] ORDER**

Complaint Filed: August 24, 2018

1 Plaintiff HOPE SOLO (“Plaintiff”) and Defendant UNITED STATES SOCCER  
2 FEDERATION (“Defendant”), by and through their respective counsel, recognizing this Court’s  
3 June 7, 2019 **ORDER** directing the parties to meet and confer on ways to streamline discovery  
4 and other pretrial proceedings with respect to cases that raise similar claims and issues, namely,  
5 the litigation pending in the Central District of California, *Morgan, et al. v. United States Soccer*  
6 *Federation, Inc.*, Case No. 2:19-cv-01717-RGK-AGR (C.D. Cal.) (the “*Morgan* litigation”), (ECF  
7 No. 49), do hereby stipulate to request that the proceedings in the above captioned matter be  
8 stayed for 90 days for the good cause detailed below:

9 1. On September 4, 2019, this Court set the following deadlines in its Case  
10 Management Scheduling Order (ECF No. 79):

- 11 • Close of Fact Discovery by 4/6/20
- 12 • Designation of Experts by 4/20/2020
- 13 • Rebuttal Reports due by 5/18/2020
- 14 • Expert Discovery due by 6/1/2020
- 15 • Dispositive Motions due by 6/29/2020
- 16 • Pretrial Conference set for 10/8/2020
- 17 • Jury Selection and Trial set for 10/19/2020

18 2. Since September 2019, in consideration of the Court’s June 7, 2019 **ORDER**,  
19 Plaintiff and Defendant have been working diligently and cooperatively through the discovery  
20 process and have been coordinating discovery with the parties in the *Morgan* matter where  
21 appropriate and reasonable.

22 3. On February 20, 2020, cross motions for summary judgment are due to be filed in  
23 the *Morgan* matter. Plaintiff is presently a member of the opt-out Title VII certified class and  
24 intends to coordinate discussions of her Equal Pay Act claim with the class claim in the *Morgan*  
25 matter, pursuant to an agreement reached with Defendant. Therefore, the outcome of those motions  
26 will likely have an impact on Plaintiff’s claims.

27 4. The *Morgan* class action matter is scheduled for trial on May 5, 2020.  
28

1 5. Over the week of February 10-17, 2020, attorneys for Plaintiff and Defendant met  
2 and conferred concerning the related proceedings in the *Morgan* litigation.

3 6. Additionally, Plaintiff and Defendant continue to discuss the potential for resolution  
4 of this matter.

5 7. Given the likely impact of the *Morgan* litigation on Plaintiff's claims, overlapping  
6 discovery, related motion practice, and ongoing discussions for potential resolution, the Parties  
7 hereby **STIPULATE** that it is in the interest of efficiency and judicial economy that all deadlines in  
8 the above-captioned matter be stayed for 90 days. When this stay is lifted, Plaintiff and Defendant  
9 will promptly request that the Court issue a revised Scheduling Order consistent with the pre-trial  
10 timing and deadlines set out in the September 4, 2019, Case Management Scheduling Order (ECF  
11 No. 79) and the Court's trial and docket availability.

12 **IT IS STIPULATED.**

13 DATED: February 20, 2020

By:           /s/ A.J. de Bartolomeo          

A.J. de Bartolomeo (SBN 136502)  
**TADLER LAW LLP**  
P.O. Box 475847  
San Francisco, CA 94147-5847  
Telephone: (415) 226-0260  
Email: ajd@tadlerlaw.com

Brian R. Morrison (*admitted pro hac vice*)  
**TADLER LAW LLP**  
One Penn Plaza, 36<sup>th</sup> Floor  
New York, NY 10119  
Telephone: (646) 924-1040  
Email: bmorrison@tadlerlaw.com

Timothy W. Moppin (SBN 133363)  
Attorney at Law  
2015 Junction Avenue  
El Cerrito, CA 94530  
Telephone: (510) 232-0442  
Email: timmoppin@yahoo.com  
                  timmoppin@aol.com

Richard M. Nichols (SBN 166638)  
876 Arlene Way  
Novato, CA 94530  
Telephone: (415) 314-0066  
Email: Rnicholspc@gmail.com

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Paul K. Stafford  
**THOMPSON & KNIGHT LLP**  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
Telephone: (214) 969-1106  
Email: [paul.stafford@tklaw.com](mailto:paul.stafford@tklaw.com)

Attorneys for Plaintiff Hope Solo

DATED: February 20, 2020

**SEYFARTH SHAW LLP**

By: /s/ Chantelle C. Egan  
Ellen E. McLaughlin (IL 6181045)  
(admitted pro hac vice)  
Chantelle C. Egan  
Attorneys for Defendant  
United States Soccer Federation, Inc.

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1, I certify that all other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Date: February 20, 2020

By: Chantelle C. Egan  
Chantelle C. Egan

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

DATED \_\_\_\_\_

\_\_\_\_\_  
Hon. James Donato  
United States District Judge