## TO THE COURT AND ALL PARTIES:

PLEASE TAKE NOTICE that through this Notice and the papers filed herewith, Plaintiff CONSUMER FINANCIAL PROTECTION BUREAU ("Bureau") hereby applies *ex parte* for the Court to stay the deadlines set forth in the Court's Scheduling Conference Order (ECF No. 40) and Order Granting Joint Stipulation and Request to Modify Scheduling Conference Order (ECF No. 84).

This *ex parte* application is made following the conference of counsel for the Bureau with counsel for SoLo. That conference took place telephonically on February 3, 2025. During the meet and confer (and later during an informal conference with Judge Richlin), counsel explained the substance of the *ex parte* application. SoLo's counsel is consulting with their client to determine how to respond, and Counsel for the Bureau had not yet heard back as of the time of this filing.

This *ex parte* application is based upon this Notice, the Bureau's *ex parte* application, the declaration of Bradley H. Cohen, and a proposed order. Copies of the foregoing will be served upon counsel of record via the CM/ECF system and will also be delivered to the Court via email.

Respectfully submitted,

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## 1 **CERTIFICATE OF SERVICE** 2 I hereby certify that I electronically filed the foregoing with the Clerk of the 3 Court for the United States District Court for the Central District of California by 4 5 using the CM/ECF system on February 3, 2025, which accomplished service on the 6 following counsel of record: 7 THOMAS M. HEFFERON (admitted pro hac vice) 8 THefferon@goodwinlaw.com 9 LEVI W. SWANK (admitted pro hac vice) LSwank@goodwinlaw.com 10 GOODWIN PROCTER LLP 11 1900 N Street, NW Washington, DC 20036 12 13 LAURA A. STOLL (SBN: 255023) LStoll@goodwinlaw.com 14 **GOODWIN PROCTER LLP** 15 601 S. Figueroa Street, 41st Floor Los Angeles, CA 90017 16 17 KERE K. TICKNER (SBN: 174777) KTickner@McGlinchey.com 18 McGLINCHEY STAFFORD PLLC 19 18201 Von Karman Avenue, Suite 350 Irvine, CA 92612 20 21 DANIEL T. PLUNKETT (pro hac vice) Dplunkett@McGlincheu.com 22 McGLINCHEY STAFFORD PLLC 23 601 Poydras Street 12th Floor New Orleans, LA 70160 24 25 JORDAN GOLDFARB (pro hac vice) Jgoldfarb@McGlinchey.com 26 McGLINCHEY STAFFORD PLLC 101 Ne 3rd Avenue, Suite 1810 27 Fort Lauderdale, FL 33301

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1	ZELMA M. FREDERICK (pro hac vice)				
2	Zfrederick@McGlinchey.com  McGLINCHEY STAFFORD PLLC				
3	301 Main Street Suite 1400				
4	Baton Rouge, LA 70801				
5	I certify under penalty of perjury that the foregoing is true and correct.				
6					
7	Executed on February 3, 2025.				
8					
9	/s/ Bradley H. Cohen BRADLEY H. COHEN				
10	BRADELT II. COILEN				
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