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FILED

Superior Court of California
County of Los Angeles

01/28/2026

David W. Slayton, Executive Officer / Clerk of Court

By: R. Mendoza Deputy

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

CALIFORNIA FACULTY ASSOCIATION,
UNITED AUTOMOBILE, AEROSPACE,
AND AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA, LOCAL 4123,
TEAMSTERS LOCAL 2010, MARGARITA
BERTA-ÁVILA, LOREN CANNON,
CHRISTOPHER COX, MOLLY TALCOTT,
and ERICKA VERBA,

Petitioner/Plaintiffs,

vs.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY,

Respondent/Defendant.

Case No. 25STCP03935

Assigned to Honorable Stephen I. Goorvitch
Dept. 82

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL**

Complaint Filed: October 10, 2025
Trial Date: None

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

3 Petitioners/Plaintiffs California Faculty Association; United Automobile, Aerospace, and
4 Agricultural Implement Workers of America, Local 4123; Teamsters Local 2010; Margarita Berta-
5 Ávila; Loren Cannon; Christopher Cox; Molly Talcott; and Ericka Verba (collectively,
6 “Petitioners”) and Defendant Board of Trustees of the California State University (“CSU”, and all
7 of the foregoing, the “Parties”), by and through their respective counsel of record, hereby jointly
8 apply to the Court for the following relief pursuant to this Stipulation:

9 WHEREAS, on October 10, 2025, Petitioners filed this action and on November 3, 2025,
10 filed the First Amended Petition asserting claims for relief against CSU;

11 WHEREAS, CSU denies and disputes Petitioners’ claims and allegations and does not
12 admit any liability, wrongdoing, or legal obligation independent of the agreement reflected in this
13 Stipulation;

14 WHEREAS, in order to avoid the substantial expense and inconvenience of further
15 litigation, the Parties now desire to fully and finally settle this action on the terms set forth in this
16 Stipulation.

17 **IT IS THEREFORE STIPULATED AND AGREED**, as follows:

- 18 1. The Parties stipulate to dismissal of the pending litigation before entry of any order on the
19 preliminary injunction motion. The Court retains jurisdiction to enforce this Stipulation
20 under Code of Civil Procedure section 664.6.
- 21 2. All Parties bear their own costs and fees.
- 22 3. CSU will provide notice to the respective employee as soon as reasonably practicable
23 before complying with any subpoena for personal information—as defined in the
24 Information Practices Act, Civil Code section 1798.3, subdivision (a)—from the EEOC
25 relating to its investigation of antisemitism on CSU campuses, unless notice would be
26 prohibited by law or regulation.
- 27 4. CSU will provide notice to the respective employee as soon as reasonably practicable
28 before complying with any data request for personal information—as defined in the

1 Information Practices Act, Civil Code section 1798.3, subdivision (a)—from the
2 Department of Education, Office of Civil Rights in its investigation relating to the PhD
3 Project, unless notice would be prohibited by law or regulation.

4 5. CSU agrees to notify the respective employee of any enforcement proceeding relating to a
5 subpoena or data request covered by paragraphs 3 or 4 above.

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8 **IT IS SO STIPULATED.**

9 DATED: January 21, 2026

MUNGER, TOLLES & OLSON LLP

11
12 By: /s/ Bryan H. Heckenlively
13 Bryan H. Heckenlively
14 *Attorneys for Respondent Board of Trustees of the*
California State University

15 DATED: January 20, 2026

ROTHNER, SEGALL & GREENSTONE

17 By: /s/ Julia Harumi Mass
18 Julia Harumi Mass
19 *Attorneys for Petitioners*
California Faculty Association, Berta-Ávila,
Cannon, Cox, Talcott, and Verba

20 DATED: January 21, 2026

SCHWARTZ, STEINSAPIR, DOHRMANN &
SOMMERS LLP

23 By: /s/ Margo A. Feinberg
24 Margo A. Feinberg
25 *Counsel for Petitioner UAW Local 4123*

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DATED: January 20, 2026

BEESON TAYER & BODINE

By: /s/ Susan K. Garea
Susan K. Garea
Counsel for Petitioner Teamsters Local 2010

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[PROPOSED] ORDER

Upon consideration of the parties' stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

This action is dismissed. The Court retains jurisdiction to enforce this stipulation under Code Civ. Proc. 664.6. All Parties shall bear their own costs and fees. All pending motions are denied as moot and all court dates are vacated.

IT IS SO ORDERED.

DATED: January 28, 2026



A handwritten signature in black ink that reads "Stephen I. Goorvitch".

Stephen I. Goorvitch / Judge

Honorable Stephen I. Goorvitch