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Plaintiff

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Attorneys for Federal Defendants
U.S. DEPARTMENT OF EDUCATION
LINDA MCMAHON

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

STANLEY ZHONG, *et al.*,

Plaintiffs,

v.

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, *et al.*,

Defendants.

No. 2:25-cv-00495-DAD-CSK

STIPULATION AND ~~PROPOSED~~ ORDER RE: PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT (ECF 36)

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

STIPULATION AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendants U.S. Department of Education and Linda McMahon (the "Federal Defendants"), and subject to Court approval, that:

1. The Federal Defendants do not oppose Plaintiffs' Motion for Leave to File Second Amended Complaint (ECF 36). The Federal Defendants' non-opposition does not waive the Federal Defendants' right to move to dismiss the Second Amended Complaint or otherwise dispute or defend against any and all allegations and claims asserted in the Second Amended Complaint.

2. The Federal Defendants' deadline to respond to the operative pleading in this case is stayed pending resolution of Plaintiffs' Motion to File Second Amended Complaint. The Federal Defendants' deadline to respond to the operative pleading shall be no sooner than October 9, 2025.

Dated: August 22, 2025

Respectfully submitted,

/s/ *Stanley Zhong* (authorized 8/22/2025)
STANLEY ZHONG
Plaintiff

Dated: August 22, 2025

/s/ *Nan Zhong* (authorized 8/22/2025)
NAN ZHONG
Plaintiff

Dated: August 22, 2025

ERIC GRANT
United States Attorney

By: /s/ *Joseph Frueh*
JOSEPH FRUEH
Assistant United States Attorney

Attorneys for Defendants
U.S. DEPARTMENT OF EDUCATION
LINDA MCMAHON

IT IS SO ORDERED

Dated: August 29, 2025

HON. CHI SOO KIM
United States Magistrate Judge