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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

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

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

**IT IS SO STIPULATED.**

DATED: January 21, 2026

MUNGER, TOLLES & OLSON LLP



By:

Bryan H. Heckenlively  
*Attorneys for Respondent Board of Trustees of the California State University*

DATED: January 20, 2026

ROTHNER, SEGALL & GREENSTONE



By:

Julia Harumi Mass  
*Attorneys for Petitioners California Faculty Association, Berta-Ávila, Cannon, Cox, Talcott, and Verba*

DATED: January 21, 2026

SCHWARTZ, STEINSAPIR, DOHRMANN & SOMMERS LLP



By:

Margo A. Feinberg  
*Counsel for Petitioner UAW Local 4123*



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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: \_\_\_\_\_, 2026

\_\_\_\_\_  
Honorable Stephen I. Goorvitch