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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 THE STATE OF CALIFORNIA, *et al.*,

16 *Plaintiffs,*

17 v.

Case No. 4:26-cv-7116-AMO

Case No. 4:26-cv-7212-AMO

18
19 PARAMOUNT SKYDANCE CORP. *et al.*,

20 *Defendants.*

**STIPULATION AND [PROPOSED] ORDER
NOT TO CLOSE**

21
22 WRITERS GUILD OF AMERICA, WEST.,
INC., *et al.*,

23 *Plaintiffs,*

24 v.

25 PARAMOUNT SKYDANCE CORP., *et al.*,

26 *Defendants.*
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1 WHEREAS, on July 13, 2026, Plaintiffs the State of California, the State of Arizona, the State of
2 Colorado, the State of Connecticut, the Commonwealth of Massachusetts, the State of Minnesota, the
3 State of Nevada, the State of New Jersey, the State of New Mexico, the State of New York, the State of
4 Oregon, and the State of Washington (collectively, the “Plaintiff States”) filed the action, *The State of*
5 *California v. Paramount Skydance Corp.*, 4:26-cv-7116-AMO (*State of California*), seeking to
6 permanently enjoin Defendant Paramount Skydance Corporation’s (“Paramount”) acquisition of
7 Defendant Warner Bros. Discovery Inc. (“Warner Bros.”) (the “Transaction”), as a violation of Section 7
8 of the Clayton Act, 15 U.S.C. § 18. Plaintiff States further moved for a temporary restraining order to
9 temporarily enjoin the transaction. (Dkt. No. 27).

10 WHEREAS, on July 14, 2026, Plaintiffs Writers Guild of America, West, Inc., and Writers Guild
11 of America, East, Inc., (collectively, the “WGA Plaintiffs”) filed the action, *Writers Guild of America,*
12 *West, Inc. v. Paramount Skydance Corp.*, 4:26-cv-7212-AMO (*Writers Guild*), also seeking to
13 permanently enjoin the Transaction as a violation of Section 7 of the Clayton Act, 15 U.S.C. § 18.

14 WHEREAS, on July 20, 2026, the Court granted Plaintiff States’ motion for a temporary restraining
15 order in the *State of California* matter, issued the operative temporary restraining order temporarily
16 enjoining the Transaction, and set a briefing schedule on a motion for preliminary injunction to be heard
17 on August 3, 2026. (Dkt. No. 141).

18 WHEREAS, on July 22, 2026, the WGA Plaintiffs filed a motion for preliminary injunction (Dkt.
19 No. 58), as well as a motion to shorten time on the motion for preliminary injunction seeking to align the
20 motion for preliminary injunction briefing in *Writers Guild* with the motion for preliminary injunction
21 briefing in *State of California*. (Dkt. No. 60).

22 WHEREAS, on July 23, 2026, the Court issued an Order re Scheduling and Extending Temporary
23 Restraining Order in *State of California* (Dkt. No. 166) and Order re Scheduling in *Writers Guild* (Dkt.
24 No. 63), aligning the briefing schedule on the motions for preliminary injunction in both matters, finding
25 good cause to extend the temporary restraining order to August 17, 2026, and ordering the parties to meet
26 and confer to reach consensus on the path forward in resolving the two motions for preliminary injunction.

27 WHEREAS, on July 23, 2026, and July 24, 2026, the parties met and conferred to discuss the
28 scheduling of these matters.

1 THEREFORE, IT IS HEREBY STIPULATED by the parties through their respective counsel, that:

2 1. The transaction at issue in *State of California* and *Writers Guild* shall not close, be
3 consummated, or otherwise be completed and Defendants will not take any steps, directly or indirectly,
4 to integrate or consolidate their operations pursuant to the Transaction until the earlier of (1) five days
5 after the merits determination in these matters, or (2) June 1, 2027. This stipulation and order extends
6 to Defendants' agents, officers, servants, employees, attorneys, and other persons who are in active
7 concert or participation with Defendants.

8 2. The briefing deadlines and August 3, 2026 hearing date for Plaintiff States' motion for
9 preliminary injunction are cancelled. The WGA Plaintiffs' motion for preliminary injunction is
10 withdrawn. Plaintiff States and WGA Plaintiffs will be permitted to file motions for preliminary
11 injunction orders, if necessary, at a later date.

12 3. This stipulation shall not waive or modify any rights, schedules, or deadlines of any party
13 relating to any post-judgment appeal, including any injunctive relief pending appeal.

14 4. This stipulation is without prejudice to any party's claims, defenses, arguments, or
15 positions in this action.

16 5. The parties will submit a joint statement in each of their respective cases regarding the
17 scheduling of the trial in each matter by Friday, July 31, 2026.

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19 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.
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By: /s/ Jeffrey L. Kessler

Jeffrey L. Kessler (*pro hac vice*)

WINSTON TAYLOR LLP

200 Park Avenue

New York, NY 10166-4193

Telephone: (212) 294-4698

Facsimile: (212) 294-4700

jeffrey.kessler@winstontaylor.com

Jeanifer E. Parsigian (SBN 289001)

Matthew R. DalSanto (SBN 282458)

WINSTON TAYLOR LLP

101 California Street, 21st Floor

San Francisco, CA 94111-5891

Telephone: (415) 591-1469

Facsimile: (415) 591-1400

jeanifer.parsigian@winstontaylor.com

matthew.dalsanto@winstontaylor.com

Conor A. Reidy (*pro hac vice*)

Kevin B. Goldstein (*pro hac vice*)

WINSTON TAYLOR LLP

300 N. LaSalle Drive

Chicago, IL 60654-3406

Telephone: (312) 558-7542

Facsimile: (312) 558-5700

conor.reidy@winstontaylor.com

kevin.goldstein@winstontaylor.com

Matthew R. Huppert (*pro hac vice*)

WINSTON TAYLOR LLP

1901 L Street NW

Washington, DC 20036-3506

Telephone: (202) 282-5004

Facsimile: (202) 282-5100

matt.huppert@winstontaylor.com

Marguerite Sullivan (*pro hac vice pending*)

Christopher J. Brown (*pro hac vice pending*)

LATHAM & WATKINS LLP

555 Eleventh Street NW, Suite 1000

Washington, DC 20004

Telephone: (202) 637-2200

Facsimile: (202) 637-2201

marguerite.sullivan@lw.com

christopher.brown@lw.com

Attorneys for Defendant Paramount Skydance Corporation.

By: /s/ Daniel M. Petrocelli

Daniel M. Petrocelli (SBN 97802)

FOR PLAINTIFF STATE OF CALIFORNIA:

ROB BONTA

Attorney General of California

By: /s/ Ashley Kaplan

PAULA L. BLIZZARD (SBN 207920)

Senior Assistant Attorney General

NATALIE S. MANZO (SBN 155655)

BRENT K. NAKAMURA (SBN 283572)

Supervising Deputy Attorneys General

DANIEL D. AMBAR (SBN 278853)

WINSTON H. CHEN (SBN 166959)

MATTHEW E. DELGADO (SBN 306999)

NICOLE S. GORDON (SBN 224138)

JENNIFER K. HANE (SBN 275729)

ASHLEY KAPLAN (SBN 293443)

CASEY KOVARIK (SBN 348032)

DIVYA B. RAO (SBN 292853)

Deputy Attorneys General

300 South Spring Street, Suite 1702

Los Angeles, CA 90013-1230

Telephone: (213) 269-6153

Fax: (916) 731-3637

Email: Daniel.Ambar@doj.ca.gov

RICHARD PARKER (SBN 62356)

JAMES WEINGARTEN (*pro hac vice*)

ADAM DI VINCENZO (*pro hac vice*)

GRANT BERMAN (*pro hac vice*)

ANASTASIA PASTAN (*pro hac vice*)

JULIA MAY (*pro hac vice*)

NATALIE NOGUEIRA (*pro hac vice*)

ALLISON CHESKY (*pro hac vice*)

MILBANK LLP

1101 New York Ave. NW

Washington, DC 20005

Telephone: (202) 835-7525

Email: jweingarten@milbank.com

KELLY D. GARCIA (*pro hac vice*)

MILBANK LLP

55 Hudson Yards

New York, NY 10001

Telephone: (212) 530-5871

Email: kgarcia@milbank.com

Attorneys for Plaintiff State of California.

FOR PLAINTIFF STATE OF ARIZONA:

KRISTIN K. MAYES

O'MELVENY & MYERS LLP

1999 Avenue of the Stars, 8th Floor
 Los Angeles, California 90067-6035
 Telephone: (310) 553-6700
 Facsimile: (310) 246-6779
 dpetrocelli@omm.com

Peter C. Herrick (*pro hac vice*)

O'MELVENY & MYERS LLP

1301 Avenue of the Americas, Suite 1700
 New York, NY 10019-6022
 Telephone: (212) 326-2000
 Facsimile: (212) 326-2061
 pherrick@omm.com

Julia A. Schiller (*pro hac vice*)

O'MELVENY & MYERS LLP

1625 Eye Street NW
 Washington, DC 20006-4061
 Telephone: (202) 383-5300
 Facsimile: (202) 383-5414
 jschiller@omm.com

Derek Ludwin (*pro hac vice*)

Henry Liu (*pro hac vice*)

Ross A. Demain (*pro hac vice*)

COVINGTON & BURLING LLP

One CityCenter
 850 10th Street NW
 Washington, DC 20001
 Telephone: (202) 662-6000
 dludwin@cov.com
 hliu@cov.com
 rdemain@cov.com

Bernard A. Nigro Jr. (*pro hac vice*)

Kathleen S. O'Neill (*pro hac vice*)

FRIED FRANK HARRIS SHRIVER & JACOBSON LLP

801 17th Street NW
 Washington, DC 20006
 Telephone: (202) 639-7000
 Facsimile: (202) 639-7003
 barry.nigro@friedfrank.com
 kathy.oneill@friedfrank.com

*Attorneys for Defendant Warner Bros.
 Discovery, Inc.*

Attorney General of Arizona

/s/ Allison Weber

ROBERT A. BERNHEIM (*pro hac vice*)

Unit Chief Counsel

SARAH PELTON (*pro hac vice*)

ALLISON WEBER (*pro hac vice*)

Assistant Attorneys General

2005 N. Central Avenue

Phoenix, AZ 85004

Telephone: (602) 542-3725

Fax: (602) 542-4377

Email: consumer@azag.gov

Attorneys for Plaintiff State of Arizona

FOR PLAINTIFF STATE OF COLORADO:

PHILIP J. WEISER

Attorney General of Colorado

/s/ Bryn A. Williams

BRYN A. WILLIAMS (SBN 301699)

First Assistant Attorney General

AMY BOWLES (*pro hac vice*)

Assistant Attorney General

1300 Broadway, 10th Floor

Denver, CO 80203

Telephone: (720) 508-6000

Email: Bryn.Williams@coag.gov

Amy.Bowles@coag.gov

Attorneys for Plaintiff State of Colorado

FOR PLAINTIFF STATE OF CONNECTICUT:

WILLIAM TONG

Attorney General of Connecticut

NICOLE DEMERS (*pro hac vice* forthcoming)

Deputy Associate Attorney General

/s/ Julián A. Quiñones Reyes

JULIÁN A. QUIÑONES REYES (*pro hac vice*)

FRANKLIN KANIN (*pro hac vice* forthcoming)

Assistant Attorneys General

Office of the Connecticut Attorney General

165 Capitol Avenue

Hartford, CT 06106

Telephone: (860) 808-5030

Email: Franklin.Kanin@ct.gov

Attorneys for Plaintiff State of Connecticut

FOR PLAINTIFF COMMONWEALTH OF
MASSACHUSETTS:

ANDREA JOY CAMPBELL
Attorney General of Massachusetts

/s/ Anthony W. Mariano

ANTHONY W. MARIANO (*pro hac vice*)
Chief, Antitrust Division

WILLIAM L. TWOMEY (*pro hac vice*)
Assistant Attorney General, Antitrust
Division

Office of the Massachusetts Attorney
General

One Ashburton Place, 18th Floor

Boston, MA 02108

Telephone: (781) 835-7990

Email: Anthony.Mariano@mass.gov

William.Twomey@mass.gov

*Attorneys for Plaintiff Commonwealth of
Massachusetts*

FOR PLAINTIFF STATE OF MINNESOTA:

KEITH ELLISON
Attorney General of Minnesota

/s/ Jon M. Woodruff

JAMES W. CANADAY (SBN 368825)
Deputy Attorney General

ELIZABETH ODETTE (*pro hac vice*
forthcoming)

Antitrust Division Manager

Assistant Attorney General

JON M. WOODRUFF (*pro hac vice*)

Assistant Attorney General

445 Minnesota Street, Suite 600

Saint Paul, MN 55101-2130

Telephone: (651) 300-7425

Fax: (651) 296-9663

Email: Jon.Woodruff@ag.state.mn.us

Attorneys for Plaintiff State of Minnesota

FOR PLAINTIFF STATE OF NEVADA:

AARON D. FORD
Attorney General of Nevada

ERNEST D. FIGUEROA

Consumer Advocate

/s/ Samantha B. Feeley

SAMANTHA B. FEELEY (NV Bar No. 14034)
(*pro hac vice*)

Senior Deputy Attorney General
Office of the Nevada Attorney General
100 N. Carson St.
Carson City, Nevada 89701
Tel: (775) 684-1100
Email: sfeeley@ag.nv.gov

Attorney for Plaintiff State of Nevada

FOR PLAINTIFF STATE OF NEW JERSEY:

JENNIFER DAVENPORT
Attorney General of New Jersey

/s/ Ana Atta-Alla

ANA ATTA-ALLA (*pro hac vice*)
Deputy Attorney General
State of New Jersey
Office of the Attorney General
Division of Law
124 Halsey Street – 5th Floor
Newark, NJ 07102
Telephone: (973) 648-6835
Email: Ana.Atta-Alla@law.njoag.gov

Attorneys for Plaintiff State of New Jersey

FOR PLAINTIFF STATE OF NEW
MEXICO:

RAÚL TORREZ
Attorney General of New Mexico

/s/ Amanda Butler

AMANDA BUTLER (*pro hac vice*)
Senior Counsel
KALISTA M. WILSON (*pro hac vice*
forthcoming)
Assistant Attorney General
408 Galisteo St.
Santa Fe, NM 87501
Telephone: (505) 490-4060
Fax: (505) 318-1050
Email: KWilson@nmdoj.gov

Attorneys for Plaintiff State of New Mexico

FOR PLAINTIFF STATE OF NEW YORK:

LETITIA JAMES
Attorney General of New York

/s/ Elinor R. Hoffmann

ELINOR R. HOFFMANN (*pro hac vice*)
Chief, Antitrust Bureau
AMY MCFARLANE (*pro hac vice*)
Deputy Chief, Antitrust Bureau
PRATIK AGARWAL (*pro hac vice*)
MORGAN FEDER (*pro hac vice*)
C. WILLIAM MARGRAVE (*pro hac vice*)
Assistant Attorneys General
JAYA MANTOVANI (*pro hac vice*)
Attorney General Fellow
New York State Office of the Attorney
General
28 Liberty Street
New York, NY 10005
Telephone: (212) 416-8269
Email: Elinor.Hoffman@ag.ny.gov

Attorneys for Plaintiff State of New York

FOR PLAINTIFF STATE OF OREGON:

DAN RAYFIELD
Attorney General of Oregon

/s/ Ian Van Loh

TIMOTHY D. SMITH (*pro hac vice*)
Attorney-in-Charge
IAN VAN LOH (SBN 280254)
ALEX DELORENZO (*pro hac vice*)
Senior Assistant Attorneys General
Economic Justice Section
Oregon Department of Justice
100 SW Market St.
Portland, OR 97201
Telephone: (503) 798-3297
Telephone: (971) 239-7457
Telephone: (503) 428-9482
Email: tim.smith@doj.oregon.gov
Email: ian.vanloh@doj.oregon.gov
Email: alex.delorenzo@doj.oregon.gov

Attorneys for Plaintiff State of Oregon

FOR PLAINTIFF STATE OF WASHINGTON:

NICHOLAS W. BROWN
Attorney General of Washington

/s/ Christina M. Black

JONATHAN A. MARK (*pro hac vice*)
Division Chief, Antitrust Division
CHRISTINA M. BLACK (SBN 300081)
BROOKE H. LOVROVICH (*pro hac vice*)
Assistant Attorneys General
800 Fifth Avenue, Suite 200
Seattle, WA 98104-3188
Telephone: (206) 464-7744
Fax: (206) 464-6451
Email: Jonathan.Mark@atg.wa.gov
Christina.Black@atg.wa.gov
Brooke.Lovrovich@atg.wa.gov

Attorneys for Plaintiff State of Washington

By: /s/ Kellie Lerner

KELLIE LERNER (*pro hac vice*)
ELLISON A. SNIDER (*pro hac vice*)
BENJAMIN B. ALLEN (*pro hac vice*)
SHINDER CANTOR LERNER LLP
14 Penn Plaza, Suite 1900
New York, NY 10122
Telephone: (646) 960-8601
kellie@scl-llp.com
esnider@scl-llp.com
ballen@scl-llp.com

J. WYATT FORE (*pro hac vice*)
SHINDER CANTOR LERNER LLP
600 14th Street, NW
Washington, D.C. 20005
Telephone: (646) 960-8632
wyatt@scl-llp.com

DAVID C. BROWNSTEIN (SBN: 141929)
DAVID M. GOLDSTEIN (SBN: 142334)
FARMER BROWNSTEIN JAEGER
GOLDSTEIN SIEGEL & SHEPARD LLP
155 Montgomery Street, Suite 301 San
Francisco, CA 94104-2733
Telephone: (415) 962-2873
dbrownstein@fbjgss.com
dgoldstein@fbjgss.com

CHARLES J. LADUCA (*pro hac vice*)
N. SLADE BOND II (*pro hac vice*)
CUNEO GILBERT FLANNERY & LADUCA,
LLP
2445 M Street, NW Suite 740
Washington, D.C. 20037

1 Telephone: (202) 789-3960
2 sbond@cuneolaw.com

3 SARAH ROONEY (*pro hac vice*)
4 **CUNEO GILBERT FLANNERY & LADUCA,**
5 **LLP**
6 8705 Colesville Road
7 B. 133
8 Silver Spring, MD 20910
9 Telephone: (301) 518-7428
10 srooney@cuneolaw.com

11 MICHAEL J. FLANNERY (SBN: 196266)
12 **CUNEO GILBERT FLANNERY & LADUCA,**
13 **LLP**
14 Two CityPlace Drive
15 St. Louis, MO 63141
16 Telephone: (314) 226-1015
17 mflannery@cuneolaw.com

18 MATTHEW J. PLATKIN (*pro hac vice*)
19 AARON HAIR (*pro hac vice*)
20 **PLATKIN LLP**
21 413 Washington Avenue, Unit 174
22 Belleville, NJ 07109
23 Telephone: (973) 561-1951
24 mplatkin@platkinllp.com
25 ahaier@platkinllp.com
26 *Attorneys for Plaintiffs the Writers Guild of*
27 *America, West, Inc., and the Writers Guild of*
28 *America East Inc.*

1 **PURSUANT TO STIPULATION**, the transaction at issue in State of California and Writers Guild shall
2 not close, be consummated, or otherwise be completed and Defendants will not take any steps, directly or
3 indirectly, to integrate or consolidate their operations pursuant to the transaction until the earlier of (1)
4 five days after the merits determination in these matters, or (2) June 1, 2027. This stipulation and order
5 extend to Defendants' agents, officers, servants, employees, attorneys, and other persons who are in active
6 concert or participation with Defendants.

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8 **IT IS SO ORDERED.**

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10 Dated: _____, 2026

11 **ARACELI MARTÍNEZ-OLGUÍN**
12 **United States District Judge**
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