

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Tiz, Inc. d/b/a Provi,

Plaintiff,

v.

Southern Glazer's Wine and Spirits, LLC
and Republic National Distributing
Company, LLC,

Defendants.

Civil Action No. 1:22-cv-1648

Hon. Franklin U. Valderrama

Magistrate Judge Laura K. McNally

JOINT NOTICE AND REQUEST FOR PARTIAL STAY OF DISCOVERY

Plaintiff Tiz, Inc. d/b/a Provi (Provi) and defendant Southern Glazer's Wine and Spirits, LLC (SGWS) jointly provide this notice that they have reached an agreement in principle to resolve this suit as between them, subject to negotiation and execution of a definitive agreement.

Pursuant to their agreement, Provi and SGWS have agreed to stay discovery between them to allow the parties time to negotiate the definitive agreement. Provi and SGWS request that the Court so order a stay of discovery as between Provi and SGWS for a period of 45 days for this purpose. Provi and SGWS will provide the Court with a status update on or before May 16, 2025.

Provi's claims against defendant Republic National Distributing Company, LLC remain pending and will not be stayed.

Dated: April 2, 2025

Harry P. Susman (*admitted pro hac vice*)
Alex Kaplan (*admitted pro hac vice*)
Richard W. Hess (*admitted pro hac vice*)
Jerry Klaristenfeld (*admitted pro hac vice*)
SUSMAN GODFREY, L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
hsusman@susmangodfrey.com
akaplan@susmangodfrey.com
rhess@susmangodfrey.com
jklaristenfeld@susmangodfrey.com

Jillian Hewitt (*admitted pro hac vice*)
Emily Portuguese (*admitted pro hac vice*)
SUSMAN GODFREY L.L.P.
One Manhattan West, 50th Floor
New York, NY 10001
Telephone: (212) 336-8330
jhewitt@susmangodfrey.com
eportuguese@susmangodfrey.com

Respectfully submitted,

/s/Alex Kaplan
Kalpana Srinivasan (*admitted pro hac vice*)
SUSMAN GODFREY, L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
ksrinivasan@susmangodfrey.com

Megan Cunniff Church (ARDC #6281234)
MOLOLAMKEN LLP
300 N. LaSalle Street
Chicago, IL 60654
Telephone: (312) 450-6716
mchurch@mololamken.com

David D. Cross (*admitted pro hac vice*)
GOODWIN PROCTER LLP
1900 N Street, NW
Washington, DC 20036
Telephone: (202) 346-4050
dcross@goodwinlaw.com

Counsel for Plaintiff Tiz, Inc. d/b/a Provi

By: /s/ Catie Ventura

Kaitlyn Coverstone (ARDC #6326755)
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
kaitlyn.coverstone@kirkland.com

Craig S. Primis (*admitted pro hac vice*)
K. Ross Powell (*admitted pro hac vice*)
Catie Ventura (ARDC #6312589)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave, NW
Washington, DC 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200
craig.primis@kirkland.com
ross.powell@kirkland.com
catie.ventura@kirkland.com

*Attorneys for Defendant Southern
Glazer's Wine and Spirits, LLC*

CERTIFICATE OF SERVICE

I certify that on April 2, 2025, I caused a copy of the foregoing document to be served by the ECF System for the U.S. District Court for the Northern District of Illinois.

/s/ Alex Kaplan