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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

MABVAX THERAPEUTICS HOLDINGS, INC.,

Plaintiff,

v.

SICHENZIA ROSS FERENCE LLP (f/k/a SICHENZIA ROSS FERENCE KESNER LLP; f/k/a SICHENZIA ROSS FRIEDMAN FERENCE LLP) and HARVEY KESNER,

Defendants.

Case No.: 3:18-cv-02494-WQH-DEB

JOINT APPLICATION FOR STAY PENDING BANKRUPTCY COURT APPROVAL OF SETTLEMENT

Before: U.S. District Judge William Q. Hayes

Date/Time: To Be Set By Court

I. APPLICATION

The Court previously stayed this action to conserve the resources of Plaintiff MabVax Therapeutics Holdings, Inc. ("MabVax") and Defendants Sichenzia Ross Ference LLP ("SRF" or "Sichenzia") and Harvey Kesner ("Kesner," with SRF, "Defendants," and with SRF and MabVax, the "Parties") and to facilitate mediation. ECF No. 125.

As a result of that mediation, the Parties have signed a term sheet to resolve the claims brought in this action. The Parties are preparing a formal stipulation of settlement (which they have agreed to complete within 21 days) and will then need to seek approval of the Settlement from the United States Bankruptcy Court for the District of Delaware.

The parties respectfully ask the Court to continue the stay of this action pending Bankruptcy Court approval. A proposed order is attached.

DATED: July 23, 2020

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