

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

In Re Norada Entities Securities Litigation

Case No. 8:26-ml-03189-MWC-ADS

**ORDER SETTING INITIAL
SCHEDULING CONFERENCE**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Michelle Williams Court
Dept.: Courtroom 6A

By order of the Judicial Panel on Multidistrict Litigation, the actions listed in Exhibit A of this Order were transferred and assigned to this Court for coordinated or consolidated pretrial proceedings under [28 U.S.C. § 1407](#). (See Transfer Order, [Dkt. #1](#)).

The court expects counsel to comport themselves with professionalism, courtesy, and civility throughout these proceedings. The Manual for Complex Litigation, Fourth at section 10.21 captures this spirit in these terms: “The added demands and burdens of complex litigation

place a premium on attorney professionalism, and the judge should encourage counsel to act responsibly. The certification requirements of Federal Rules of Civil Procedure 11 and 26(g) reflect some of the attorneys' obligations as officers of the court."

Because of the high level of competence and experience that attorneys ordinarily bring to this type of litigation, the court is confident that this objective will be achieved without judicial intervention.

Because these cases merit special attention as complex litigation, this Court **ORDERS** the following:

I. INITIAL SCHEDULING CONFERENCE

A. Attendance

Counsel shall appear for an Initial Scheduling Conference on October 9, 2026 at 1:30 p.m. in Courtroom 6A of the Felicitas and Gonzalo Mendez United States Courthouse located at 350 West First Street, Los Angeles, CA 90012.

The Court strongly prefers that counsel appear in-person; however, Zoom appearances will be permitted for the Conference to accommodate extenuating circumstances. Any request for a Zoom appearance should be made in accordance with this Court's regular procedures. Additionally, if a party's counsel is unable to attend the Conference, that party may designate another counsel to represent his or her interests at the Conference. Moreover, to minimize costs and facilitate a manageable Conference, parties with similar interests may also agree on a single attorney, or a limited number of attorneys, to act on their joint behalf at the Conference. A party will not, by designating an attorney to represent his or her interests at the Conference, be precluded from other representation during the litigation.

B. Service List

This Order is being emailed or mailed to counsel identified in the actions listed in Exhibit

A. Counsel on this list are requested to forward a copy of this Order to other attorneys who should be notified of the Conference. An updated service list will be prepared after the Conference.

C. Other Participants

Persons who are not named as parties in this litigation but may later be joined as parties or are parties in related litigation pending in other federal and state courts are invited to attend in person or by counsel.

D. Purposes and Agenda

The Conference will be held for the purposes specified in Fed. R. Civ. P. 16(a), 16(b), 16(c), and 26(f) and subject to the sanctions prescribed in Rule 16(f). The Court intends to address the following issues at the initial scheduling Conference: (1) the overall structure of Counsel, (2) the appointment of Plaintiffs' Lead Counsel, (3) any outstanding motions to dismiss, (4) preliminary case management issues, including the frequency of regular status conferences, and (5) any other issues requiring prompt resolution. Counsel are encouraged to advise the court as soon as possible of any items that should be added to the agenda.

E. Preparation for the Initial Scheduling Conference

1. Procedures for Complex Litigation

Counsel are expected to familiarize themselves with the Manual for Complex Litigation, Fourth Edition and are required to review the Local Rules for the Central District of California and this Court's general procedures, all of which may be found on the Central District of

California website at www.cacd.uscourts.gov. Counsel are expected to be prepared at the Conference to suggest procedures that will facilitate the just, speedy, and inexpensive resolution of this litigation.

2. Initial Conference of Counsel

Before the Conference, counsel shall confer and seek consensus to the extent possible with respect to the items on the agenda, including a proposed discovery plan under Rule 26(f) and a suggested schedule under Rule 16(b) for joinder of parties, amendment of pleadings, consideration of any class action allegations, motions, and trial. **The court designates Robert V. Cornish Jr. and Thomas Andrew Szott to arrange the initial meetings of plaintiffs' and defendants' counsel, respectively.** This designation will not have any impact on the Court's ultimate selection of Lead or Liaison Counsel.

F. Preliminary Joint Report

Counsel shall submit one preliminary joint no later than September 25, 2026. The report shall be no longer than 25 pages. Defendants' Counsel shall take charge of preparing and filing this joint report. Statements contained in the preliminary joint report and any supplemental reports shall not be binding, will not waive claims or defenses, and may not be offered into evidence against a party in later proceedings.

Where possible, the Court urges counsel to set forth their views in a single report that notes both consensus views and divergent views, should any disagreements arise.

Any party may supplement the report with a filing of no more than five pages. Any supplement must also be filed by the September 25, 2026 deadline.

a) Meet and Confer

Before submitting this report and in preparation for the initial scheduling conference, counsel shall meet and confer to seek consensus, wherever possible, on any immediate issues and other matters they wish to bring to the attention of the Court.

b) Content of the Report

The preliminary report shall include the following under corresponding section headings:

1. A statement of counsel's understanding of the facts and the key legal issues in this case. Counsel should underscore where facts and legal issues may materially differ between certain categories of cases. Any potentially dispositive issues should be separately identified;
2. A statement of counsel's position(s) on the need for consolidated and/or master complaint(s), and/or short-form complaint(s) in this action. A statement of counsel's position(s) on how the Court should address the pending motions to dismiss in the individual cases;
3. A list of all related cases pending in state or federal court and their current status, to the extent known;
4. An estimate of the total number of related cases counsel expect to be filed. A statement of counsel's view(s) on best practices for docket management in light of the estimated total number of cases (i.e., whether documents affecting all actions be filed only on the MDL docket, or also on the dockets of the individual actions);
5. A list of all known related cases pending in state or federal court and their current status;
6. A list of all pending motions;

7. A list of all adjudicated motions (not including pro hac vice motions, motions for extension, or other ministerial motions);
8. A list of all outstanding discovery;
9. A list of all parents, subsidiaries, and companies affiliated with the corporate parties, as well as a list of all counsel associated in this litigation. These lists will help the Court identify any issues relating to recusal or disqualification;
10. Counsel's position(s) on whether there is a need to appoint a special master pursuant to Federal Rule of Civil Procedure 53 or an independent scientific expert;
11. Counsel's view(s) on whether it would be helpful to the Court to receive a technical tutorial on the product(s) involved in this case and, if so, in what format;
12. A brief statement regarding any other topics that counsel seeks to address at the initial scheduling Conference that require immediate attention.

G. Interim Measures

1. Admission of Counsel

Attorneys admitted to practice and in good standing in any United States District Court are admitted pro hac vice in this litigation. Association of local co-counsel is not required.

2. Filings

The Clerk of Court will maintain a master docket case file styled "In Re Norada Entities Securities Litigation" and the case number "8:26-ml-03189." All documents relating to any cases in this MDL action shall be filed in this Master file.

Documents that pertain to all actions shall have the following language on the caption page: "This Document Relates to: ALL ACTIONS." When a document is intended to apply to

fewer than all cases, this Court's docket number for each individual case shall appear immediately after the words "This Document Relates to."

3. Pleadings

Each defendant is granted an extension of time for responding by motion or answer to the complaint(s) until a date to be set at the Conference.

4. Pending and New Discovery

Pending the Conference, all outstanding disclosure and discovery proceedings are stayed and no further discovery shall be initiated. This order does not (1) preclude voluntary informal discovery regarding the identification and location of relevant documents and witnesses; (2) preclude parties from stipulating to the conduct of a deposition that has already been scheduled; (3) prevent a party from voluntarily making disclosures, responding to an outstanding discovery request under Federal Rule of Civil Procedure 33, 34, or 36; or (4) authorize a party to suspend its efforts in gathering information needed to respond to a request under Rule 33, 34, or 36. Relief from this stay may be granted for good cause shown, such as the ill health of a proposed deponent.

5. Preservation of Records

a) Order to Meet and Confer

To further the just, speedy, and economical management of discovery, the parties are **ORDERED** to meet and confer as soon as practicable, no later than 30 days after the date of this order, to develop a plan for the preservation of documents, data, and tangible things reasonably anticipated to be subject to discovery in this action. The parties may conduct this conference as part of the Rule 26(f) conference if it is scheduled to take place within 30 days of the date of this

order. The resulting preservation plan may be submitted to this Court as a proposed order under Rule 16(e).

b) Subjects for Consideration

The parties should attempt to reach agreement on all issues regarding the preservation of documents, data, and tangible things. These issues include, but are not necessarily limited to:

1. The extent of the preservation obligation, identifying the types of material to be preserved, the subject matter, time frame, the authors and addressees, and key words to be used in identifying responsive materials;
2. The identification of persons responsible for carrying out preservation obligations on behalf of each party;
3. The form and method of providing notice of the duty to preserve to persons identified as custodians of documents, data, and tangible things;
4. Mechanisms for monitoring, certifying, or auditing custodian compliance with preservation obligations;
5. Whether preservation will require suspending or modifying any routine business processes or procedures, with special attention to document-management programs and the recycling of computer data storage media;
6. The methods to preserve any volatile but potentially discoverable material, such as voicemail, active data in databases, or electronic messages;
7. The anticipated costs of preservation and ways to reduce or share these costs; and

8. A mechanism to review and modify the preservation obligation as discovery proceeds, eliminating or adding particular categories of documents, data, and tangible things.

c) Duty to Preserve

1. Until the parties reach agreement on a preservation plan, all parties and their counsel are reminded of their duty to preserve evidence that may be relevant to this action. The duty extends to documents, data, and tangible things in the possession, custody and control of the parties to this action, and any employees, agents, contractors, carriers, bailees, or other nonparties who possess materials reasonably anticipated to be subject to discovery in this action. Counsel is under an obligation to exercise reasonable efforts to identify and notify such nonparties, including employees of corporate or institutional parties.

2. “Documents, data, and tangible things” is to be interpreted broadly to include writings; records; files; correspondence; reports; memoranda; calendars; diaries; minutes; electronic messages; voicemail; E-mail; telephone message records or logs; computer and network activity logs; hard drives; backup data; removable computer storage media such as tapes, disks, and cards; printouts; document image files; Web pages; databases; spreadsheets; software; books; ledgers; journals; orders; invoices; bills; vouchers; checks; statements; worksheets; summaries; compilations; computations; charts; diagrams; graphic presentations; drawings; films; charts; digital or chemical process photographs; video, phonographic, tape, or digital recordings or transcripts thereof; drafts; jottings; and notes. Information that serves to identify, locate, or link such material, such as file inventories, file folders, indices, and metadata, is also included in this definition.

3. “Preservation” is to be interpreted broadly to accomplish the goal of maintaining the integrity of all documents, data, and tangible things reasonably anticipated to be subject to

discovery under Fed. R. Civ. P. 26, 45, and 56(e) in this action. Preservation includes taking reasonable steps to prevent the partial or full destruction, alteration, testing, deletion, shredding, incineration, wiping, relocation, migration, theft, or mutation of such material, as well as negligent or intentional handling that would make material incomplete or inaccessible.

4. If the business practices of any party involve the routine destruction, recycling, relocation, or mutation of such materials, the party must, to the extent practicable for the pendency of this order, either:

- a. halt such business processes;
- b. sequester or remove such material from the business process; or
- c. arrange for the preservation of complete and accurate duplicates or copies of such material, suitable for later discovery if requested.

5. Before the Conference to develop a preservation plan, a party may apply to the court for further instructions regarding the duty to preserve specific categories of documents, data, or tangible things. A party may seek permission to resume routine business processes relating to the storage or destruction of specific categories of documents, data, or tangible things, upon a showing of undue cost, burden, or overbreadth.

d) Procedure in the Event No Agreement is Reached

If, after conferring to develop a preservation plan, counsel do not reach agreement on the subjects listed under paragraph G.5(b) of this order or on other material aspects of preservation, the parties are to submit to the court within three days of the Conference a statement of the unresolved issues together with each party's proposal for their resolution of the issues. In framing an order regarding the preservation of documents, data, and tangible things, the court will

consider those statements as well as any statements made in any applications under section IV of this order.

H. Motions

No motion shall be filed under Rule 11, 12, or 56 without leave of court and unless it includes a certificate that the movant has conferred with opposing counsel in a good-faith effort to resolve the matter without court action.

I. Orders of Transferor Courts

All orders by transferor courts imposing dates for pleading or discovery are vacated.

J. Website

The Court will publish key orders, notices, and other items of interest to an MDL webpage, which will be accessible from the Central District of California's Cases of Interest webpage: <https://www.cacd.uscourts.gov/newsworthy/cases-of-interest>.

II. LATER FILED CASES

This order shall also apply to related cases later filed in, removed to, or transferred to this court.

III. ORGANIZATION OF COUNSEL

All counsel for Plaintiffs shall meet and confer and file a single report of no longer than five (5) pages including the following:

1. A statement on counsel's position(s) on the organizational structure of Plaintiff's counsel the Court should adopt for this case, including the proposed structure and responsibilities for Lead Counsel, any Liaison Counsel, or any steering committees.

2. If Plaintiffs' counsel agree that certain individuals should serve as Lead Counsel or Liaison Counsel, or lead proposed steering committees, they should include this information in their report. However, Plaintiffs' counsel will still be required to submit applications to be appointed as Lead Counsel, as set forth below.

3. To the extent counsel's views may differ, those differing views should be outlined in the report.

IV. APPLICATIONS FOR LEAD AND LIAISON COUNSEL APPOINTMENTS

Applications for lead counsel and/or a plaintiffs' steering committee, as well as plaintiffs' liaison counsel shall be filed with on or before September 25, 2026. The court will only consider attorneys who have filed a civil action in this litigation. The main criteria for these appointments are (1) willingness and ability to commit to a time-consuming process; (2) ability to work cooperatively with others; (3) professional experience in this type of litigation; and (4) access to sufficient resources to advance the litigation in a timely manner. Applications should also set forth attorney fee proposals, rates, and percentages that applicants expect to seek if the litigation succeeds in creating a common fund.

Applications must include:

1. A resume no longer than two pages;

2. A letter no longer than three pages (single-spaced) that addresses the four criteria for appointments identified above, the names and contact information of judges before whom the applicant has appeared in complex matters, any other considerations that qualify counsel for a leadership position, and attorney fee proposals, rates, and/or percentages that applicants expect to seek if the litigation succeeds in creating a common fund. The court shall make the final determination as to the compensation and reimbursement of Plaintiffs' Counsel;

3. Applications may also include an attachment indicating the names of other counsel who have filed cases in this MDL litigation and support the applicant's appointment as lead counsel;

4. Applications should indicate whether, in the event that the Court opts to appoint both Lead Counsel and Liaison Counsel for Plaintiffs, counsel is willing to serve as Liaison Counsel for Plaintiffs if they are not appointed as Lead Counsel.

Each applicant for Lead Counsel and/or Liaison Counsel for Plaintiffs may speak for up to five minutes in support of his or her application. Only those attorneys who submit a timely application shall have the chance to speak at the Initial Scheduling Conference.

IT IS SO ORDERED.

DATED: September 9, 2026



HON. MICHELLE WILLIAMS COURT
UNITED STATES DISTRICT JUDGE

EXHIBIT A
In Re Norada Entities Securities Litigation, MDL 3189
Individual Cases

Central District of California

8:26-cv-00684-MWC-ADS	Clifford Coglietti et al v. Marco G. Santarelli et al
8:26-cv-00686-MWC-ADS	Beata Zimon et al v. Marco G. Santarelli et al
8:26-cv-00688-MWC-ADS	Sammy Rivera et al v. Marco G. Santarelli et al
8:26-cv-00689-MWC-ADS	Bruce Parkinson v. Marco G. Santarelli et al
8:26-cv-00690-MWC-KES	Jeremy Fusselman v. Marco G. Santarelli et al
8:26-cv-00691-MWC-ADS	Joe Mosquera et al v. Marco G. Santarelli et al
8:26-cv-00693-MWC-KES	Steven Rumstein et al v. Marco G. Santarelli et al
8:26-cv-00694-MWC-ADS	James Graef et al v. Marco G. Santarelli et al
8:26-cv-00695-MWC-ADS	Harold Mayfield v. Marco G. Santarelli et al
8:26-cv-00696-MWC-ADS	Mark Sanders et al v. Marco G. Santarelli et al
8:26-cv-00698-MWC-ADS	Trista Yerkich et al v. Marco G. Santarelli et al
8:26-cv-00699-MWC-ADS	Vicky McDaniel et al v. Marco G. Santarelli et al
8:26-cv-00700-MWC-ADS	Ms Second Space LLC et al v. Marco G. Santarelli et al
8:26-cv-00702-MWC-ADS	Brooke Ashe Investments LLC et al v. Santarelli et al
8:26-cv-00703-MWC-ADS	Casitas Holdings, LLC et al v. Santarelli et al

Middle District of Florida

8:26-cv-02220-MWC-ADS	Sammy Rivera et al v. Aspire Events LLC et al
8:26-cv-02221-MWC-ADS	Beata Zimon et al v. Aspire Events LLC et al
8:26-cv-02222-MWC-ADS	Clifford Coglietti et al v. Aspire Events LLC et al
8:26-cv-02223-MWC-ADS	Bruce Parkinson v. Aspire Events LLC et al
8:26-cv-02224-MWC-ADS	Jeremy Fusselman v. Aspire Events LLC et al
8:26-cv-02225-MWC-ADS	Joe Mosquera et al v. Aspire Events LLC et al
8:26-cv-02227-MWC-ADS	Steven Rumstein et al v. Aspire Events LLC et al
8:26-cv-02228-MWC-ADS	James Graef et al v. Aspire Events LLC et al
8:26-cv-02229-MWC-ADS	Harold Mayfield v. Aspire Events LLC et al
8:26-cv-02231-MWC-ADS	Sanders et al v. Aspire Events LLC et al
8:26-cv-02232-MWC-ADS	Yerkich et al v. Aspire Events LLC et al
8:26-cv-02233-MWC-ADS	Vicky McDaniel et al v. Aspire Events LLC et al
8:26-cv-02234-MWC-ADS	M's Second Space LLC et al v. Aspire Events LLC et al
8:26-cv-02235-MWC-ADS	Brooke Ashe Investments LLC et al v. Aspire Events LLC et al
8:26-cv-02236-MWC-ADS	Casitas Holdings, LLC et al v. Aspire Events LLC et al

District of Wyoming

8:26-cv-02237-MWC-ADS	Kathleen Grossart Taylor et al v. Norada Capital Management LLC et al
8:26-cv-02239-MWC-ADS	Beata Zimon et al v. Norada Capital Management LLC et al
8:26-cv-02240-MWC-ADS	Samy Rivera et al v. Norada Capital Management LLC et al
8:26-cv-02241-MWC-ADS	Jeremy Fusselman v. Norada Capital Management LLC et al
8:26-cv-02242-MWC-ADS	Joe Mosquera et al v. Norada Capital Management LLC et al
8:26-cv-02243-MWC-ADS	Steven Rumstein et al v. Norada Capital Management LLC et al
8:26-cv-02244-MWC-ADS	James Graef et al v. Norada Capital Management LLC et al
8:26-cv-02245-MWC-ADS	Harold Mayfield v. Norada Capital Management LLC et al
8:26-cv-02246-MWC-ADS	Mark Sanders et al v. Norada Capital Management LLC et al
8:26-cv-02247-MWC-ADS	Trista Yerkich et al v. Norada Capital Management LLC et al
8:26-cv-02248-MWC-ADS	M's Second Space LLC et al v. Norada Capital Management LLC et al
8:26-cv-02250-MWC-ADS	Clifford Coglietti et al v. Norada Capital Management LLC et al
8:26-cv-02251-MWC-ADS	Brooke Ash Investments LLC et al v. Norada Capital Management LLC et al
8:26-cv-02252-MWC-ADS	Parkinson v. Norada Capital Management LLC et al
8:26-cv-02253-MWC-ADS	Vicky McDaniel et al v. Norada Capital Management LLC et al