

November 19, 2021

The Honorable Elena Kagan
Supreme Court of the United States
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Washington, DC 20543

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Dear Justice Kagan:

We write to inform you of a recent development regarding *PeopleConnect, Inc. v. Knapke*, No. 21A160.

PeopleConnect's stay application seeks a stay of district court proceedings pending disposition of its petition for certiorari. PeopleConnect's petition for certiorari seeks review of a Ninth Circuit order denying a stay pending appeal of the denial of PeopleConnect's motion to compel arbitration.

Prior to filing its stay application and petition for certiorari, PeopleConnect filed motions in both the Western District of Washington and the Ninth Circuit for stays pending appeal. Respondent Knapke opposed both motions, and both motions were denied.

After PeopleConnect filed its stay application, Knapke informed PeopleConnect that Knapke would reverse positions and consent to a stay of district court proceedings pending appeal. On November 17, 2021, Knapke filed an unopposed motion in the district court seeking a stay pending appeal.

PeopleConnect's Supreme Court stay application is not yet moot because the district court has not yet ruled on that unopposed motion. But, if the district court grants that motion, the Supreme Court stay application would become moot.

PeopleConnect respectfully proposes that the Court hold in abeyance PeopleConnect's Supreme Court stay application, motion to expedite disposition of its petition for certiorari, and petition for certiorari until the district court rules on the unopposed motion for stay. If that motion is granted, PeopleConnect would withdraw its Supreme Court stay application, motion to expedite disposition of its petition for certiorari, and petition for certiorari. If that motion is denied, PeopleConnect would immediately inform the Court.

Sincerely,

/s/ Adam G. Unikowsky
Adam G. Unikowsky

cc: Counsel of Record.