

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DANIEL YEE, individually and on behalf of  
all other similarly situated,

Plaintiffs,

-against-

KALSHIEX LLC; KALSHI INC; KALSHI  
KLEAR LLC; KALSHI KLEAR INC.,  
KALSHI TRADING LLC, and DOES 1-20,

Defendants.

This action relates to:

Case No. 25-cv-8585

~~PROPOSED~~ STIPULATION TO  
CONSOLIDATE ACTIONS AND SET  
SCHEDULING DEADLINES

**JURY DEMAND**

Judge: Jennifer L. Rochon

Status Conference: February 13, 2026

Time: 12:00 p.m.

CRYSTAL PELAYO, JACOB TINGLE,  
ISAAH ESQUIBEL, GINO GADALETA,  
BRICE GAMBILL, RALEIGH  
MELANCON, and MICAH PARKER,  
individually and on behalf of others similarly  
situated,

Plaintiffs,

-against-

KALSHI INC.;KALSHIEX LLC; KALSHI  
KLEAR INC.; KALSHI KLEAR LLC; and  
KALSHI TRADING LLC,

Defendants.

Case No. 1:25-cv-9913

**JURY DEMAND**

Judge: Jennifer L. Rochon

Status Conference: February 13, 2026

Time: 12:00 p.m.

ALEXANDER HALLMAN DANIEL  
GREENBERG, NATHANIEL BEE, AND  
ABHIJN GUTTA, individually and on behalf  
of others similarly situated,

Plaintiffs,

-against-

KALSHIEX LLC, KALSHI, INC., KALSHI  
KLEAR INC., KALSHI KLEAR LLC, and  
KALSHI TRADING LLC,

Defendant.

Case No.: 1:26-cv-00317

**JURY DEMAND**

Judge: Jennifer L. Rochon

Status Conference: February 13, 2026

Time: 12:00 p.m.

**PROPOSED STIPULATION TO CONSOLIDATE ACTIONS  
AND SET SCHEDULING DEADLINES**

Plaintiffs in the above-captioned related actions (the “Related Actions”) and their counsel have conferred with Defendants Kalshi Inc., Kalshiex LLC, Kalshi Klear, Inc., Kalshi Klear LLC, and Kalshi Trading LLC (together “Defendants”) (collectively with Plaintiffs, the “Parties”) and their counsel and, pursuant to the Court’s Notice of Status Conference on February 13, 2026 at 12:00 p.m. ordering the Parties to file a [Proposed] Stipulation to Consolidate Actions and Set Scheduling Deadlines, state as follows:

**I. Consolidation**

On October 16, 2025, Plaintiff Daniel Yee filed the first class action complaint against Defendants alleging that Defendants operate an unlawful sports gambling platform. *See Yee v. KalshiEX LLC et al.*, 25-cv-08585-JLR (the “Yee Action”). Two additional and related actions were subsequently filed. *See Pelayo et al. v. Kalshi Inc. et al.*, 25-cv-09913-JLR (the “Pelayo Action”); and *Hallman et al. v. Kalshi EX LLC et al.*, 26-cv-00317-JLR (the “Hallman Action”) (the Yee, Pelayo, and Hallman Actions are collectively referred to herein as the “Related Actions”).

Because the Related Actions assert overlapping causes of actions and are premised on essentially the same factual background and legal theories, name the same Defendants, and assert claims on behalf of nearly similar classes, these Related Actions should be consolidated pursuant to Federal Rule of Civil Procedure 42. For these reasons, the Parties jointly stipulate to consolidation. The Parties further agree and propose that the Clerk administratively close the Pelayo and Hallman Actions.

By agreeing to consolidate the Related Actions and entering into this stipulation, Defendants do not waive, and expressly reserve, any and all rights and defenses which may be available to them in connection with the Related Actions.

**II. Docketing**

The Parties propose that every pleading filed in the eventual consolidated action bear the following caption:

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re KALSHI SPORTS PREDICTION MARKET  
LITIGATION

Lead Case No. 25-cv-08585 (JLR)

Consolidated with cases 25-cv-09913 and  
26-cv-00317

CLASS ACTION

**III. Appointment of Plaintiffs' Leadership Structure**

Federal Rule of Civil Procedure 23(g)(3) authorizes the Court to “designate interim class counsel to act on behalf of a putative class before determining whether to certify the action as a class action.” All Plaintiffs in the Related Actions respectfully request that the Court appoint Katherine M. Aizpuru of Tycko & Zavareei LLP, and David Stellings of Lief Cabraser Heimann & Bernstein LLP as Interim Co-Lead Class Counsel. Plaintiffs also ask the Court to appoint a small Plaintiffs’ Steering Committee comprised of Aaron L. Schwartz of Kaplan Fox & Kilsheimer LLP; Wilson Dunlavey of Lief Cabraser Heimann & Bernstein LLP; Margot Cutter of Cutter Law P.C., and Wesley Griffith of Alameda Law Group LLC, to assist and report to Interim Co-Lead Counsel in connection with the management and coordination of the litigation. See Manual for Complex Litigation (Fourth) at § 10.221 (supporting appointment of lead counsel

and a Plaintiffs' Steering Committee).<sup>1</sup> Defendants take no position on Plaintiffs' request for appointment of Interim Co-Lead Class Counsel and a Steering Committee.

#### **IV. Proposed Schedule**

If the Court grants consolidation and Plaintiffs' request for appointment of a leadership structure, the Parties propose the following schedule:

1. On or before March 24, 2026, Plaintiffs shall file their Consolidated Complaint;
2. On or before April 21, 2026, Defendants shall file a motion to compel arbitration;
3. Plaintiffs shall respond to Defendants' motion by May 21, 2026, and Defendants shall submit their reply in support of their motion(s) by June 11, 2026.

~~If the Court grants consolidation but prefers that Plaintiffs file a separate motion for appointment of Plaintiffs' leadership structure, the Parties propose the following schedule:~~

~~4. Plaintiffs shall file their motion for appointment of Plaintiffs' leadership structure on or before February 19, 2026;~~

~~5. Plaintiffs' Consolidated Complaint shall be filed within forty five (45) days of a decision and Order on Plaintiffs' motion for appointment of a Plaintiffs' leadership structure;~~

~~6. Defendants shall move to compel arbitration, within thirty (30) days of the filing of Plaintiffs' Consolidated Complaint;~~

~~7. Plaintiffs shall have thirty (30) days to respond thereto, and Defendants shall have twenty one (21) days to file their reply in support of their motion.~~

If the Court denies Defendants' motion to compel arbitration, the Parties propose the following schedule for Defendants to answer, move or otherwise respond to Plaintiffs' Consolidated Complaint:

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<sup>1</sup> The biographies and firm resumes of the leadership applicants are attached as Exhibits A-H.


8. Defendants shall answer, move, or otherwise respond to Plaintiffs' Consolidated Complaint within forty-five (45) days of the denial of their motion to compel arbitration.

9. If Defendants' response to Plaintiffs' Consolidated Complaint is a motion to dismiss, Plaintiffs shall have forty-five (45) days to respond thereto, and Defendants shall have thirty (30) days to file their reply in support of their motion.

The Clerk of Court is respectfully directed to consolidate these cases using the consolidated caption listed above and, thereafter, to administratively close the matters Hallman, et al. v. KalshiEX LLC, et al., No. 26-cv-00317 (JLR), and Pelayo, et al. v. Kalshi Inc., et al., No. 25-cv-09913 (ALC).

**STIPULATED AND AGREED:**

Dated: February 9, 2026

  
\_\_\_\_\_  
Hon. Jennifer L. Rochon  
United States District Judge

Dated: February 6, 2026

Respectfully submitted,

By: /s/ David Stellings

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David Stellings  
Wilson M. Dunlavey  
Jacob S. Miller  
**LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
250 Hudson Street, 8th Floor  
New York, NY 10013-1413  
Telephone: 212.355.9500  
Facsimile: 212.355.9592  
dstellings@lchb.com  
wdunlavey@lchb.com  
jmiller@lchb.com

*Attorneys for Plaintiffs in the Pelayo Action*

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