



The parties have recently made progress towards a potential resolution of the litigation. Rather than continuing to expend time and resources litigating the case, the parties propose a brief, sixty (60) day stay of the proceeding in order to focus on attempting to resolve this matter. The parties assert that a stay is appropriate in order to conserve the parties' and the Court's time and resources by avoiding litigation that will be unnecessary if the case is resolved.

The parties propose filing a joint status report within sixty (60) days of the entry of an order staying the case. In addition, the parties will promptly advise the Court if a settlement is reached or if negotiations reach an impasse prior to the deadline to file a status report.

### **CONCLUSION**

Under the circumstances of this case, the Court should stay this matter, including all discovery and deadlines, for sixty (60) days in order to permit to attempt to resolve the litigation and avoid unnecessarily wasting the parties' and the Court's time and resources.

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Respectfully submitted,

*s/ Richard Gora*

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