# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHANELL TRAVIS, on behalf of herself and others similarly situated,

2.18-cv-05015-RK

٧.

ASOCIACION PUERTORRIQUENOS EN MARCHA, INC

## STIPULATED PRE-TRIAL SCHEDULE AND ORDER

NOW, this 3rd day of June 2019, Shanell Travis ("Travis"), the thirty-three (33) individuals who have joined this action in response to the Court's conditional certification order (collectively "Plaintiffs") and Defendant Asociacion Puertorriquenos En Marcha, Inc. ("Defendant") STIPULATE to the following pre-trial schedule:

- 1. All discovery shall be completed on or before December 6, 2019;
- 2 Plaintiffs' expert reports, if any, shall be served on Defendant on or before October 4, 2019;
- 3. Defendants' expert reports, if any, shall be served on Plaintiffs on or before November 1, 2019.
  - 4. Dispositive motions shall be filed on or before January 3, 2020.
- 5. Any motion for decertification of the FLSA collective shall be filed on or before January 3, 2020; and
- 6. The Parties shall meet and confer and propose a further pre-trial schedule within fourteen (14) days of the later of the date on which the Court issues an order on ruling on all filed dispositive or decertification motions. If no such motions are filed, then the Parties shall meet and confer and propose a further pre-trial schedule no later than January 17, 2020.

7. Since this case now concerns thirty-four (34) Plaintiffs, it should be removed from the Court's arbitration program set forth in L.R. 53.2 and the Clerk is directed to cancel the arbitration hearing that is currently scheduled in this matter for October 2, 2019. See Doc. 21

## FOR PLAINTIFFS

/s/ R. Andrew Santillo
Peter Winebrake, Esq.
R. Andrew Santillo, Esq.
Mark Gottesfeld, Esq.
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
(215) 884-2491 Telephone

### FOR DEFENDANT:

/s/ Jacob E Brown (with permission)
Michael R. Miller, Esq.
Jacob E. Brown, Esq
Margolis Edelstein
The Curtis Center, Suite 400E
170 South Independence Mall West
Philadelphia, PA 19106
(215) 922-1100 Telephone

### SO ORDERED:

Dated: June 3, 2019

Hon. Robert F. Kelly, U.S.D J.