

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAUL GUZMAN, on behalf of himself : Civil No. 3:20-CV-01877
and others similarly situated, :
Plaintiff, :
v. :
ABBEY ROAD CONTROL, INC., :
Defendant :
Judge Jennifer P. Wilson

STIPULATION AND ORDER

The Parties hereby stipulate to the following case management deadlines subject to the Court's approval:¹

1. Discovery Deadline – Factual and Expert: March 25, 2022.
2. Expert Reports: Plaintiff's expert reports (if any) are due February 21, 2022. Defendant's expert reports (if any) are due March 11, 2022. Supplementations are due March 18, 2022.
3. Motion for Final Certification of the FLSA Collective: April 11, 2022.
4. Dispositive Motions: April 11, 2022.

¹ The Parties previously agreed to conditional certification of the FLSA collective. *See* Docs. 22 and 26. Notice ensued, and approximately 54 individuals (including originating plaintiff Guzman) have opted-in to the collective. Because the Court's original scheduling order did not set any post-conditional certification deadlines, *see* **Doc. 15**, the parties propose the deadlines described herein.

WHEREFORE, the Parties respectfully request that the Court approve the deadlines set forth in the attached Order.

FOR PLAINTIFF:

/s/ Peter Winebrake
Winebrake & Santillo, LLC

November 11, 2021
Date

FOR DEFENDANT:

/s/ Samuel E. Cohen
Gross McGinley LLP

November 11, 2021
Date

APPROVED AND SO ORDERED THIS 2nd DAY OF December, 2021.

s/ Jennifer P. Wilson
JENNIFER P. WILSON
United States District Court
Middle District of Pennsylvania