

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

ISABELLA BRISTOW, on behalf of herself and others similarly situated,	:	
	:	
	:	2:22-cv-00235-WB
Plaintiff,	:	
	:	
v.	:	
	:	
AMERIHEALTH CARITAS,	:	
	:	
Defendant.	:	

CASE MANAGEMENT PLAN

On March 11, 2022, this Court entered an Order approving the parties’ Stipulation for Conditional Certification pursuant to 29 U.S.C. § 216(b) and authorizing the issuance of collective action notice. See ECF No. 15. Therein, the Court stayed discovery pending completion of the notice and opt-in process described in the parties’ Stipulation, and directed the parties to submit a proposed schedule for the remainder of this litigation within seventy (70) calendar days of March 11, 2022, or May 20, 2022. See ECF No. 15, ¶¶ 13 and 15.

Pursuant to that Order, counsel for all parties have met and conferred and now submit the following proposed case management plan.

1. On or before **June 10, 2022**, the parties shall submit a proposed joint plan for representative fact discovery¹, including, but not limited to the scope of representative written discovery requests and depositions. In the event they are unable to reach such an agreement, the

¹ Defendant disputes that Plaintiff or other collective action members would be representative of each other and reserves all rights as to decertification, but it agrees to use the term “representative discovery” herein for convenience of the parties to address the concept that only a sample of opt-ins will be subject to discovery.

parties shall submit separate plans. The Court shall then schedule a conference call to resolve the dispute.

2. The parties shall exchange initial disclosures by June 24, 2022, or fourteen days (14) days after the Court resolves competing representative discovery proposals, whichever is later.

3. All discovery, including fact and expert discovery, shall be completed by **November 30, 2022**. If either party chooses to employ expert testimony, it must disclose the information required by Fed. R. Civ. P. 26(a)(2)(B)&(C) forty-five (45) days before the close of the discovery period. Any rebuttal reports will be due fifteen (15) days before the close of the discovery period and any reply reports will be due by the close of the discovery period. The Parties will promptly produce their experts for deposition upon request.

4. Any motion to amend the pleadings or add parties shall be filed on or before **September 2, 2022**.

5. Defendant shall file its motion for decertification of the FLSA collective on or before **January 16, 2023**. Plaintiff will have thirty (30) days to oppose such motion, and Defendant will have fourteen (14) days to file a reply brief.

6. Any motion for summary judgment under Fed. R. Civ. P. 56 shall be filed on or before **January 16, 2023**. The opposing party will have thirty (30) days to oppose any such motion, and the movant will have fourteen (14) days to file a reply brief.

7. Following the Court's decision on any summary judgment motion(s) and/or motion for decertification of the FLSA collective, the Court will schedule a status conference to discuss a proposed schedule for the remainder of this litigation, to the extent that any claims remain.

FOR PLAINTIFF:

/s/ Michael Groh

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Dated: July 7, 2022

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Dated: May 18, 2022

SO ORDERED this 7th day of July 2022.

BY THE COURT:

/s/Wendy Beetlestone, J.

Wendy Beetlestone, U.S.D.J.