

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

MARVELLA MORRIS and NOEL CORD, on behalf of themselves and others similarly situated	:	
	:	
v.	:	2:17-cv-04620-AB
	:	
PUBLIC HEALTH MANAGEMENT CORPORATION and TURNING POINTS FOR CHILDREN	:	
	:	

STIPULATED PRE-TRIAL SCHEDULE AND ORDER

Plaintiffs Marvella Morris and Noel Cord (“Originating Plaintiffs”), the individuals who have joined this action to date (collectively “Opt-In Plaintiffs”) and Defendants Public Health Management Corporation and Turning Points for Children (collectively “Defendants”)

STIPULATE to the following pre-trial schedule:

1. All discovery shall be completed on or before September 20, 2019;
2. Plaintiffs' expert reports, if any, shall be served on Defendants on or before July 19, 2019;
3. Defendants' expert reports, if any, shall be served on Plaintiffs on or before August 16, 2019.
4. Dispositive motions shall be filed on or before October 11, 2019.
5. Any motion for decertification of the FLSA collective shall be filed on or before October 11, 2019; and
6. The Parties shall meet and confer and propose a further pre-trial schedule within 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 October 18, 2019.

Dated: January 2, 2019

FOR PLAINTIFFS:

/s/ Peter Winebrake
Peter Winebrake, Esq.
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
(215) 884-2491
pwinebrake@winebrakelaw.com

FOR DEFENDANTS:

/s/ Martha J. Keon
Martha Keon, Esq.
Richard Harris, Esq.
Paul Sopher, Esq.
Littler Mendelson, P.C.
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102
267-402-3050 Telephone
mkeon@littler.com
rharris@littler.com

SO ORDERED:

Dated: _____

Anita Brody, J.

CERTIFICATE OF SERVICE

I, Martha J. Keon, hereby certify that I have on this date served a copy of the foregoing STIPULATED PRE-TRIAL SCHEDULE AND ORDER upon Plaintiffs' counsel via the Court's ECF system on this 3rd day of January 2019:

Peter Winebrake, Esq.
R. Andrew Santillo, Esq.
Mark J. Gottesfeld, Esq.
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
(215) 884-2491
Counsel for Plaintiff

/s/ Martha J. Keon
Martha J. Keon

FIRMWIDE:161613742.1 095692.1001