

Order, the Parties then are to file a Joint Status Report proposing a schedule for further briefing on such motions no later than April 2, 2021.

2. The Parties have conferred and agree that vacating the current schedule and staying the proceedings in this case would encourage settlement discussions by virtue of granting the new administration additional time to assess potential avenues for resolution.

3. Wherefore, the Parties respectfully request that the Court vacate the March 30, 2021 deadline for dispositive motions and related deadlines, stay the proceedings in this case, and instruct the Parties to submit a Joint Status Report no later than May 7, 2021, either proposing a revised briefing schedule for dispositive motions or showing good cause for a continuation of the stay. A proposed order to that effect is attached to this Motion for the Court's consideration.

Dated: March 8, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2021, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF System, which will send notification of the filing to all counsel of record in this matter.

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