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April 22, 2024

By Electronic Filing

Hon. Matthew J. Skahill
United States Magistrate Judge
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Cilluffo v. Subaru of Am., Inc.*, No. 1:23-cv-01897-RBK-MJS
Joint Request for Stay Pending Mediation

Dear Magistrate Judge Skahill:

My firm represents the Subaru Defendants in the above-referenced action. I am writing, with the consent of Plaintiffs' counsel, to inform the Court that the parties wish to explore early resolution and have commenced negotiations. The parties intend to engage Mark Goldzweig, Esq., of MG Resolutions, to mediate the settlement negotiations.

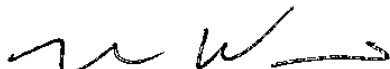
While the parties will produce certain documents on a prioritized basis, in order to facilitate the upcoming mediation, and to avoid the investment of time and costs necessary to fulfill certain approaching discovery deadlines and court submissions, the parties jointly and respectfully request that the Court stay the litigation for 60 days. Presently, the Subaru Defendants' answer is due on April 23, 2024 and the parties are scheduled to appear for a status conference on April 29, 2024.

The parties respectfully request that, in line with the jointly requested stay, the upcoming status conference be adjourned and revisited subject to the outcome of the mediation. We respectfully request that the status conference be rescheduled with Your Honor for early July 2024, at which time the parties can report on the results of the mediation. If the parties are able to reach an agreement in principle prior to the conference, we will notify Your Honor by letter.

Thank you for Your Honor's consideration of this request.

Hon. Matthew J. Skahill
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Neal Walters', with a stylized flourish at the end.

Neal Walters

NW/mds

cc: Hon. Robert B. Kugler, U.S.D.J.
All Counsel of Record