UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

CHRISTINE DAVIS, ANNA MACIAS AND LEONARDO MACIAS, individually and on behalf of a class of similarly situated individuals,

Plaintiffs,

v.

Case No.: 8:17-cv-02431-EAK-AAS

GENERAL MOTORS LLC, a Delaware limited liability company,

Defendant.

PARTIES' JOINT MOTION TO STAY PROCEEDINGS

Plaintiffs Christine Davis, Anna Macias and Leonardo Macias ("Plaintiffs") and Defendant General Motors LLC ("GM") jointly move this Court for an order staying the proceedings in this case for a period of sixty (60) days to allow an opportunity for the parties to finalize a tentative settlement in this matter, after representing as follows:

1.

Pursuant to the Court's Amended Case Management and Scheduling Order (Dkt. 46 at 5), the parties held a full day court-ordered mediation session on November 2, 2018 with mediator Rodney Max. At the mediation, the parties reached agreement on the tentative outline of a full settlement, which is subject to resolution of certain remaining issues.

2.

The parties believe that they need an additional sixty (60) days for resolving any remaining issues.

3.

Given the significant progress on settlement, and in order to allow the parties to focus on completing the settlement as opposed to spending resources on litigation, the parties believe that there is good cause for the requested sixty (60) day stay.

4.

On or before the expiration of the sixty (60) day stay, the parties will notify the Court whether the parties have reached a final and binding settlement or if the case should be placed back on the Court's docket.

Date: November 6, 2018

/s/ Russell D. Paul

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Respectfully submitted,

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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on November 6, 2018, I filed the foregoing document through the Court's CM/ECF electronic filing system, which will provide a copy to all counsel of record.

/s/ Jonathan Z. DeSantis