

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**YARINEL ROMÁN, PAUL ROBERTS II,  
and JOAQUIN RIVERA**, on behalf of  
themselves and all others similarly situated,

Case No.: 0:19-CV-61461-RAR

Plaintiffs,

v.

**SPIRIT AIRLINES, INC.**,

Defendant.

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**JOINT MOTION TO STAY DISCOVERY**

Plaintiffs Román, Roberts and Rivera (“Plaintiffs”) and Defendant Spirit Airlines, Inc. (“Defendant” or “Spirit”) file this Joint Motion to Stay Discovery and state as follows:

1. Based upon the procedural posture of this action, and the Court’s consideration as to whether to consolidate this case with the related matter of *Guzman v. Spirit Airlines, Inc.*, Plaintiffs and Spirit believe a stay of discovery is appropriate until such time as the Court resolves the issue of consolidation and adjudicates Spirit’s pending motions filed pursuant to Fed. R. Civ. P. 12(c).

2. After holding a hearing and receiving the positions of the parties in this case and the *Guzman* matter, this Court vacated the existing scheduling order in this action. ECF No. 50. Subsequently, the Plaintiffs in this matter filed a motion to stay the *Guzman* matter (ECF No. 52), and Spirit filed a motion for judgment on the pleadings (ECF No. 54).

3. The resolution of those motions will have a direct impact on the scope of this case and any subsequent discovery conducted by the parties. To conserve the resources of the parties and this Court, Plaintiffs and Spirit have jointly agreed that discovery should be stayed until such

time as the Court adjudicates the pending motions and enters a new scheduling order. Spirit agrees that the issuance of such a stay will not be a basis for an argument that Plaintiffs are not diligently pursuing their claims. Rather, the parties have worked together in good faith and believe the requested stay conserves resources and promotes efficiency.

4. Therefore, the parties jointly request that this Court enter an order staying discovery until such time as the Court adjudicates the consolidation issue, the pending motions, and enters a new scheduling order.

Respectfully submitted this 4<sup>th</sup> day of March, 2020.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 4, 2020, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Alec H. Schultz  
Alec H. Schultz

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\_\_\_\_\_ /

**ORDER JOINT MOTION TO STAY DISCOVERY**

THIS CAUSE having come before the Court on the parties' Joint Motion to Stay Discovery, and the Court having considered the motion and all other relevant factors, it is hereby ORDERED AND ADJUDGED that:

1. The Joint Motion to Stay Discovery is GRANTED.
2. This matter shall remain stayed until such time as the Court adjudicates the consolidation issue, any pending motions and enters a new scheduling order.

DONE AND ORDERED in Broward County, Florida, this \_\_\_\_\_ day of March, 2020.

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HONORABLE RODOLFO A. RUIZ, II  
United States District Judge

Copies furnished to: All Counsel of Record