

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DAVID STEPHENS, KAITLYN
STRAWN, *and* JOHN F. PINCKNEY,
*individually and on behalf of all others
similarly situated,*

Plaintiffs,

v.

CHICK-FIL-A, INC.,

Defendant.

Case No. 1:23-cv-00964-LMM

**NOTICE OF SETTLEMENT AND
JOINT MOTION FOR STAY OF
PROCEEDINGS**

Plaintiffs David Stephens, Kaitlyn Strawn, and John F. Pinckney (together, “Plaintiffs”), and Defendant Chick-fil-A, Inc. (“Defendant”), the parties to the above-captioned action (together, the “Parties”), hereby provide notice that they have reached a settlement in principle in the above-captioned action subject to agreeing to and executing a mutually acceptable settlement agreement and therefore respectfully jointly move this Court for a Stay of Proceedings for 60 days to enable the Parties to draft the settlement paperwork, execute the settlement, and then file a notice of dismissal. Specifically, the Parties request the case be stayed until December 11, 2023, by which date the Parties intend for the notice of dismissal to be filed. In support of this joint motion, the Parties show the Court the following:

1. The Parties have reached a settlement in principle in the above-captioned action subject to agreeing to and executing a mutually acceptable settlement agreement.

2. The Parties have met and conferred and agreed to request a Stay of Proceedings until December 11, 2023 in order to allow the Parties to draft and execute a mutually acceptable settlement agreement and then file a notice of dismissal.

3. The Parties make this request in good faith and not for purposes of delay.

4. The Parties appreciate the Court's accommodation thus far and have used this time to settle the matter.

For the above reasons, the Parties respectfully request that the Court enter an Order staying the action until December 11, 2023.

A Proposed Order is attached hereto as Exhibit A.

Respectfully submitted,

Date: October 11, 2023

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Date: October 11, 2023

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Counsel for Defendant

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, I hereby certify that this document has been prepared in Times New Roman, 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1C.

Date: October 11, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

Date: October 11, 2023

Respectfully submitted,

By: Erin B. Edwards

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