

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ROBIN VELEZ, KAREN BURKE,
JACQUELINE SIMMONS, DEBRA
SHEARER, CAROL BARLOW and
CARMEN GREENE, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TRISTAR PRODUCTS, INC.,

Defendant.

CASE NO. 1:21-CV-23909-MGC-JJO

**JOINT MOTION FOR STAY OF PROCEEDINGS,
INCLUDING DEADLINE FOR DEFENDANT TO FILE ITS
MOTION TO COMPEL ARBITRATION**

Defendant Tristar Products, Inc. (“Tristar”) and Plaintiffs Robin Velez, Karen Burke, Jacqueline Simmons, Debra Shearer, Carol Barlow And Carmen Greene (“Plaintiffs”), respectfully seek a 60-day stay of these proceedings, including the February 1, 2022 deadline for Tristar to file its anticipated Motion to Compel Arbitration.¹

In support of their joint request, the parties state that they are presently in the process of attempting to resolve the issues raised in this action, including specifically those issues implicated by Tristar’s anticipated Motion to Compel Arbitration. The parties believe that additional time could lead to a resolution of that anticipated motion, and potentially the matter.

¹ For the avoidance of doubt, this motion is not intended to operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right to arbitrate, defense, affirmative defense, or objection, including any defenses pursuant to Rule 12(b).

This motion is brought in good faith and not with the purpose of delay, the granting of this extension of time will not prejudice the parties or the litigation, and all parties agreed to the requested relief.

In the alternative, the parties jointly request a 30-day extension of time for Tristar to file its anticipated Motion to Compel Arbitration from the current deadline of February 1, 2022 (as set by ECF No. 14) up to and including March 3, 2022.

WHEREFORE, the parties respectfully request that the Court enter the proposed Order granting a 60-day stay of this action, including and through March 28, 2022.

Dated: January 28, 2022

Respectfully Submitted,

/s/ Melissa C. Pallett-Vasquez

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 28, 2022 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Melissa C. Pallett-Vasquez

Melissa C. Pallett-Vasquez