

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KAY WENGER, on Behalf of Herself  
and Others Similarly Situated,

Plaintiff,

v.

SETERUS, INC., and NATIONSTAR  
MORTGAGE, LLC

Defendants.

**Civil Action No. 4:18-cv-02393-MWB**

**NOTICE OF SETTLEMENT AND MOTION TO STAY**

Plaintiff Kay Wenger (“Plaintiff”), by and through undersigned counsel, hereby notifies the Court that the parties have reached an agreement in principle to settle the litigated claims in this case on a class-wide basis, subject to Court approval. The parties are presently drafting a written Settlement Agreement and related documents. The parties are working collaboratively to consolidate this matter and the Related Actions in a single forum for the purposes of settlement approval and administration, and will file the necessary papers to seek settlement approval or otherwise resolve this Action by December 17, 2020.

Based on the foregoing, Plaintiff respectfully requests that all current deadlines be suspended pending the filing of the proposed Settlement Agreement. A proposed Order is attached.

Dated: November 3, 2020.

Respectfully Submitted,

CHIMICLES SCHWARTZ KRINER  
& DONALDSON-SMITH LLP

/s/ Benjamin F. Johns

Benjamin F. Johns (PA ID No. 201373)  
361 West Lancaster Avenue  
Haverford, Pennsylvania 19041  
Telephone: (610) 642-8500

Facsimile: (610) 649-3633  
Email: [bfj@chimicles.com](mailto:bfj@chimicles.com)

WHITFIELD BRYSON LLP  
Scott C. Harris (Admitted *Pro Hac Vice*)  
900 W. Morgan St.  
Raleigh, NC 27603  
Telephone: (919) 600-5000  
Facsimile: (919) 600-5035  
Email: [scott@wbmlp.com](mailto:scott@wbmlp.com)

MAGINNIS LAW PLLC  
Edward H. Maginnis (Admitted *Pro Hac Vice*)  
Asa C. Edwards, IV  
(*Admission Pro hac vice pending*)  
4801 Glenwood Ave., Suite 310  
Raleigh, NC 27612  
Telephone: (919) 526-0450  
Facsimile: (919) 882-8763  
Email: [emaginnis@maginnislaw.com](mailto:emaginnis@maginnislaw.com)  
[aedwards@maginnislaw.com](mailto:aedwards@maginnislaw.com)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on November 3, 2020 he served a copy of the foregoing document with the Clerk of the Court using CM/ECF, which is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

CHIMICLES SCHWARTZ KRINER  
& DONALDSON-SMITH LLP

/s/ Benjamin F. Johns

Benjamin F. Johns (PA ID No. 201373)  
361 West Lancaster Avenue  
Haverford, Pennsylvania 19041  
Telephone: (610) 642-8500  
Facsimile: (610) 649-3633  
Email: bfj@chimicles.com

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**[PROPOSED] ORDER**

This cause came before the Court pursuant to the Notice of Settlement filed on November \_\_\_\_, 2020. In the Notice of Settlement, Plaintiffs advised the Court that the parties have reached an agreement in principle to settle the litigated claims in this action on a class-wide basis, subject to Court approval. And that the Parties are diligently working together to draft and finalize a written settlement agreement and related documents. Plaintiffs will prepare a motion seeking preliminary approval from the Court of the class-wide settlement, which Plaintiffs will endeavor to file by December 17, 2020.

Based on the foregoing, all further proceedings and all pending deadlines in this case are hereby stayed. Plaintiff shall have until December 17, 2020, to file the necessary papers to seek settlement approval or otherwise resolve this Action.

SO ORDERED, this the \_\_\_\_\_ day of November, 2020.

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MATTHEW W. BRANN  
United States District Court Judge