

- 1 3. **Legal Issues:** To Plaintiffs' knowledge, there are no legal issues genuinely in dispute.
- 2 4. **Motions:** If this matter does not settle and a Stipulation for Entry of Judgment is not
3 filed within the next month, Plaintiffs will enter Defendant's default and file a motion for summary
4 judgment.
- 5 5. **Amendment of Pleadings:** At this time, Plaintiffs do not anticipate again amending
6 the complaint.
- 7 6. **Evidence Preservation:** Plaintiffs have been advised to preserve all evidence relevant
8 to the issues reasonably evident in this action.
- 9 7. **Disclosures:** Because the parties have agreed to a settlement, they have not served their
10 initial disclosures, including a list of names, addresses and telephone numbers of individuals likely
11 to have discoverable information that each may use to support their claims and a description of the
12 documents, electronically stored information and tangible things that are in Plaintiffs' possession,
13 custody or control and that each may use to support their claims.
- 14 8. **Discovery:** Since this lawsuit is based upon reports submitted by the Defendant,
15 Plaintiffs do not anticipate the need for any discovery. However, Plaintiffs reserve the right to conduct
16 additional discovery to resolve any issues related to the dispute.
- 17 9. **Class Actions:** This is not a class action.
- 18 10. **Related Cases:** The parties are unaware of any related cases or proceedings pending
19 before another judge of this court, or before another court or administrative body.
- 20 11. **Relief:** Plaintiffs seek payment of all unpaid fringe benefit contributions, liquidated
21 damages, interest, attorneys' fees and costs.
- 22 12. **Settlement and ADR:** The parties have agreed to settle this lawsuit. Plaintiffs have
23 sent Defendant a proposed Stipulation for Entry of Judgment which the Defendant and its counsel are
24 now reviewing.
- 25 13. **Consent to Magistrate Judge for All Purposes:** Plaintiffs have consented to a
26 magistrate judge to conduct all further proceedings, including trial and entry of judgment.
- 27 14. **Other References:** This case is not suitable for reference to binding arbitration, a
28 special master, or the Judicial Panel on Multidistrict Litigation.

