Woods et al v. Vector Marketing Corporation

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Pursuant to this Court's order of March 22, 2016 (docket entry 252), the Court scheduled a Further Status Conference to be held on April 7, 2016, at 10:30 a.m., with the Parties to submit a Joint Report by this date, March 31, 2016. The Parties, Plaintiffs William Woods, Dominic Seale, Wesley Varughese, Eric Essler and Casey McCaleb, and Defendant Vector Marketing Corporation, collectively "the Parties," respectfully submit this Joint Report.

As stated in the Parties' most recent Joint Further Status Conference Report (docket entry 251) dated March 17, 2016, as of that date the Parties had agreed to all material terms of the Settlement Agreement, subject to final edits and revisions and agreement on a proposed Class Notice. That process has now been completed, and the Parties can report that the Settlement Agreement is now being circulated for all signatures.

In addition, the Plaintiffs have drafted their Motion for Preliminary Approval, subject to completing one section, and Defendant has provided its preliminary comments on it. The Parties anticipate that the settlement agreement will be fully executed and the Motion for Preliminary Approval will be filed within the next week.

Based on the foregoing, the Parties request that the Further Status Conference set for April 7, 2016 be continued by one week, to April 14, 2016. Assuming the Motion for Preliminary approval is filed by April 7, the Parties will then request that the continued Status Conference date be vacated, to be re-set and held concurrently with the hearing on the Motion for Preliminary Approval.

DATED: March 31, 2016

MARLIN & SALTZMAN, LLP DIVERSITY LAW GROUP APC

By: /s/ Stanley D. Saltzman
Stanley D. Saltzman, Esq.
Christina A. Humphrey, Esq.
Leslie H. Joyner, Esq.
Attorneys for Plaintiffs

DATED: March 31, 2016

MORRISON & FOERSTER LLP

By: /s/ Karen J. Kubin
Karen J. Kubin, Esq.
Lloyd W. Aubry, Jr., Esq.
Derek F. Foran, Esq.

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Attorneys for Defendant

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

DATED: March 31, 2016

/s/ Karen J. Kubin Karen J. Kubin

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IT IS SO ORDERED that the status conference is reset from 4/7/16 to 4/21/16 at 10:30 a.m. An updated joint status report shall be filed

11 by 4/14/16.

