

1 Plaintiff JASHYUA THOMAS (“Plaintiff”) and Defendant FOUNDEVER OPERATING
2 CORPORATION (“Defendant”), by and through their undersigned counsel, hereby agree and
3 stipulate to reschedule the date for the Early Neutral Evaluation (ENE) in this matter, currently set for
4 April 28, 2025 at 10:00 a.m. with Magistrate Judge Daniel J. Albregts. Plaintiff’s counsel is unavailable
5 on the current date due to previously arranged travel plans. The Parties are both available on either May
6 19, 2025 or May 20, 2025, and propose these alternate dates for the ENE. If Judge Albregts is not
7 available on these dates, the Parties request that the ENE be rescheduled to another available date.
8

9 This is the first request to reschedule the ENE in this case. This request is made in good faith and
10 not for the purpose of delay.

11 Dated: March 10, 2025

12 Dated: March 10, 2025

13 Respectfully submitted,

14
15 Respectfully submitted,

/s/ Kathryn L. Bain

/s/ Luke W. Molleck

16 Kathryn L. Bain
17 Bain Mazza & Debski LLP
18 Attorneys for Plaintiff
Jashyua Thomas

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20 Roger L. Grangenett II
Luke W. Molleck
Little Mendelson, P.C.
Attorneys for Defendant
Foundever Operating Corporation

21 IT IS SO ORDERED. The Early Neutral Evaluation scheduled for April 28, 2025 is VACATED
22 and **RESET for May 19, 2025 at 10:00 a.m.**

23 IT IS FURTHER ORDERED that the written evaluation statements are due by 4:00 p.m. on
24 May 12, 2025.

25 IT IS FURTHER ORDERED that all other provisions of the Court’s order (ECF No. 9) shall
26 remain in effect.

27 DATED: 3/11/2025

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