

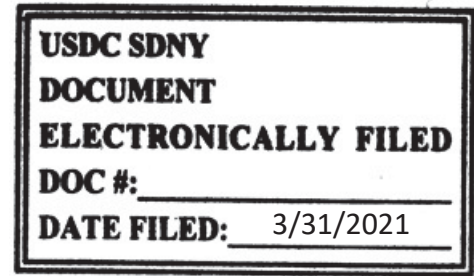
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March 30, 2021

Request GRANTED. The Court will refer this case to mediation by separate Order. Discovery deadlines are adjourned as follows: expert discovery now due June 22, 2021; fact discovery and all discovery now due July 23, 2021; the case now shall be trial ready by December 13, 2021. SO ORDERED.

Dated: March 31, 2021


Via Electronic Filing

The Honorable Stewart D. Aaron
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 Courtroom 21A
 New York, NY 10007-1312

Re: Rochez, et ano. v. BJ's Wholesale Club Inc.
1:20-cv-03066-SDA

JOINT DISCOVERY STATUS LETTER AND FORMAL
REQUEST FOR SUBMISSION AND TRANSFER TO THE
SDNY'S MEDIATION PROGRAM

Dear Magistrate Judge Aaron:

Our office represents the defendant, BJ's Wholesale Club, Inc., in the above-referenced action. We submit this joint discovery letter - which has been reviewed and approved by plaintiffs' counsel - pursuant to Your Honor's initial Case Management Plan dated May 13, 2020, as well as the subsequent joint discovery letters submitted in this action. Moreover, we jointly submit this letter as a formal request for submission and transfer of the case into the SDNY's Mediation Program. The parties have already engaged in preliminary settlement discussions and both offices believe mediation through the Court will prove useful in getting this case closer to an amicable resolution.

At present, there are no outstanding demands for paper discovery from either party. Our office has been diligently pursuing our client to schedule the deposition of a party witness. Should the case not be transferred to the Mediation Program, we will undertake every effort to have a witness produced for a deposition in accordance with your prior discovery directives.

The parties' primary goal at this time is to have the case submitted to the Mediation Program in order to foster further settlement negotiations and to eventually settle the case.

MORRISON MAHONEY LLP

March 30, 2021

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However, in the event that the case is not transferred to the Mediation Program, the parties herein jointly agree that the following So-Ordered discovery timeline shall continue to be adhered to:

- Expert Discovery due by April 23, 2021
- Fact Discovery due by May 24, 2021
- All Discovery due by May 24, 2021
- Prospective Trial Readiness date – October 25, 2021

We thank Your Honor for your time and consideration of the instant matter.

Respectfully submitted,

MORRISON MAHONEY LLP

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