



ATTORNEYS AT LAW
www.margolisedelstein.com

Ronald M. Metcho, Esquire
Email: rmetcho@margolisedelstein.com
Direct Dial: (570) 342-4231

SCRANTON OFFICE:*
220 PENN AVENUE
SUITE 305
SCRANTON, PA 18503
570-342-4231
FAX 570-342-4841

September 7, 2021

PHILADELPHIA OFFICE: *
THE CURTIS CENTER
170 S. INDEPENDENCE MALL W.
SUITE 400E
PHILADELPHIA, PA 19106-3337
215-922-1100

HARRISBURG OFFICE: *
3510 TRINDLE ROAD
CAMP HILL, PA 17011
717-975-8114

PITTSBURGH OFFICE:
THE OLIVER BUILDING
535 SMITHFIELD STREET
SUITE 1100
PITTSBURGH, PA 15222
412-281-4256

WESTERN PENNSYLVANIA OFFICE:
983 THIRD STREET
BEAVER, PA 15009
724-774-6000

CENTRAL PENNSYLVANIA OFFICE:
P.O. Box 628
HOLLIDAYSBURG, PA 16648
814-695-5064

SOUTH NEW JERSEY OFFICE: *
100 CENTURY PARKWAY SUITE 200
PO Box 5084
MOUNT LAUREL, NJ 08054
856-727-6000

NORTH NEW JERSEY OFFICE:
CONNELL CORPORATE CENTER
400 CONNELL DRIVE
SUITE 5400
BERKELEY HEIGHTS, NJ 07922
908-790-1401

DELAWARE OFFICE:
300 DELAWARE AVE.
SUITE 800
WILMINGTON, DE 19801
302-888-1112

* MEMBER OF THE HARMONIE GROUP

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

RE: Tzvi Goldring v. Monarch Recovery Management, Inc.
United States District Court Southern District of New York
Docket No.: 1:20-cv-07893-PGG
Our File No.: 42438.3-00056

Dear Judge Gardephe:

I am counsel for Defendant, Monarch Recovery Management, Inc. ("Monarch") in regard to the above-referenced matter. I am submitting this letter to respectfully request that the briefing of Plaintiff, Tzvi Goldring's Motion for Class Certification be stayed until this Honorable Court makes a decision on the parties' cross Motions for Summary Judgment.

On August 19, 2021 Your Honor issued an Order setting the deadline for September 9, 2021 for the parties to submit cross Motions for Summary Judgment and for Plaintiff to submit his Motion for Class Certification. On the same date Your Honor entered a similar Order in the consolidated matter of Lydia Tschoe v. Monarch Recovery Management, Inc. pertaining to the parties' cross Motions for Summary Judgment, but making no reference to a Motion for Class Certification in the matter as Plaintiff, Lydia Tschoe, has not yet sought to submit a Motion for Class Certification.

I am writing to respectfully request that Plaintiff, Tzvi Goldring's Motion for Class Certification and the related briefing schedule be stayed until a decision is made by this Honorable Court on the cross Motions for Summary Judgment as, depending on the outcome of the cross Motions for Summary Judgment, Plaintiff's Motion for Class Certification may be unnecessary. This request is also taking into consideration the fee shifting aspect of the Fair Debt Collection Practices Act and Monarch avoiding potential unnecessary and exorbitant defense costs associated with responding to Plaintiff, Tzvi Goldring's Motion for Class Certification.

On September 2, 2021 I sought the consent Daniel Zemel, Esq., counsel for Plaintiff, Tzvi Goldring, regarding the request to stay the briefing of Plaintiff's Motion for Class Certification until a decision is made on the cross Motions for Summary Judgment. Mr. Zemel does not consent with Monarch's request.

I appreciate Your Honor's time and consideration regarding this request.

Respectfully submitted,



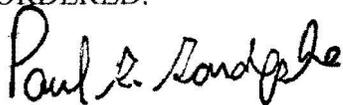
Ronald M. Metcho

cc: Daniel Zemel, Esq. (via ECF)

MEMO ENDORSED

The application is denied. The briefing schedule set forth in the Court's August 19, 2021 Order (Dkt. No. 28) remains in effect.

SO ORDERED.



Paul G. Gardephe
United States District Judge

September 8, 2021