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November 18, 2022

VIA ECF

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 202
New York, NY 10007

Re: *Louis Paulino v. Veritas Property Management L.L.C., et al.*,
Case No. 1:22-cv-08167

Dear Judge Furman:

This firm represents the Defendants in the above-referenced action. Pursuant to Sections 2.A and 2.E of Your Honor's Individual Rules & Practices in Civil Cases, we write to respectfully request, on consent, that the proceedings in the above-captioned action and any pending deadlines therein be stayed through Wednesday, March 15, 2023, to permit the parties to participate in compulsory mediation under the applicable collective bargaining agreement.

Plaintiff's employment in this matter is governed by a collective bargaining agreement (the "CBA") between Plaintiff's employer and his union, SEIU Local 32BJ. Article XIII of the CBA provides for mandatory mediation concerning the claims presented herein, makes the Plaintiff's submission to such mediation process a condition precedent to initiating litigation in any judicial forum, and permits the Plaintiff's employer to seek a stay of litigation in such litigation where this condition has not been satisfied, pending the parties' participation in the mediation process. We have conferred with counsel for Plaintiff, who consents to this application.

The instant application would affect Defendants' deadline to answer, move or otherwise respond to the Complaint, currently scheduled for Monday November 21, 2022, as well as the initial pretrial conference in this matter, currently scheduled for January 5, 2023. We ask that both dates be adjourned *sine die* and be rescheduled, should mediation prove unsuccessful in resolving the parties' dispute. We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendants


By: Stephen P. Pischl

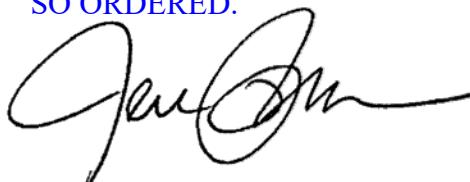
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Application GRANTED. The parties are directed to submit a joint status update on **March 16, 2023**. The Clerk of Court is directed to terminate ECF No. 11.

SO ORDERED.

cc: **VIA ECF**
FISHER TAUBENFELD LLP
Attorneys for Plaintiff



November 21, 2022