

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LI FEN YAO, as Administrator of the Estate of
Sam Mingsan Chen,

Plaintiff,

v.

ROBERT CHEN, OTTER AUDITS LLC, and RC
SECURITY LLC,

Defendant.

Case No. 8:23-cv-00889-TDC

JOINT MOTION TO STAY DISCOVERY

Plaintiff Li Fen Yao, as administrator of the Estate of Sam Chen, and Defendants Robert Chen, Otter Audits LLC, and RC Security LLC jointly, and respectfully, request that the Court stay discovery for thirty days, to July 29, 2024, for the purposes of continuing their settlement discussions with the assistance of the Honorable Ajmel A. Quereshi, to whom the Court referred the parties for purposes of a settlement conference by Order dated April 9, 2024. *See* ECF Doc. 47.

The parties participated in an initial settlement conference with Judge Quereshi on June 25, 2024, and agreed to exchange additional information for the purposes of continuing their settlement discussions. The parties reasonably expect that the process they agreed upon will take approximately thirty days, and thus jointly request a thirty-day stay of discovery, including all deadlines for serving motions to compel pursuant to Local Rule 104.8, in order to facilitate the exchange of information and settlement discussions with Judge Quereshi. If additional progress is made, the parties may request an additional stay of discovery.

In order to avoid prejudice to the parties as a result of a discovery stay, the parties also jointly, and respectfully, request a corresponding extension of thirty days of the deadlines set forth in the operative Scheduling Order (ECF Doc. 52). The current deadlines and proposed deadlines are set forth in the table below.

Event	Deadline	Proposed Modified Deadline
Plaintiff's Rule 26(a)(2) expert disclosures	August 1, 2024	September 3, 2024
Defendants' Rule 26(a)(2) expert disclosures	August 29, 2024	September 30, 2024
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	September 12, 2024	October 14, 2024
Rule 26(e)(2) supplementation of disclosures and responses	September 19, 2024	October 21, 2024
Completion of Discovery; submission of Post-Discovery Joint Status Report, see Part V	October 4, 2024	November 4, 2024
Requests for Admission	October 11, 2024	November 12, 2024
Notice of Intent to File a Pretrial Dispositive Motion	October 18, 2024	November 18, 2024

Respectfully submitted,

Rachel Clattenburg

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Attorneys for Plaintiff Li Fen Yao

Dated: June 27, 2024

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024 I caused the foregoing Joint Motion to Stay Discovery to be filed with the Court using CM/ECF which serves a copy on all counsel of record.

Stephen Plotnick

Stephen M. Plotnick

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ORDER GRANTING JOINT MOTION TO STAY DISCOVERY

Upon consideration of the parties' Joint Motion to Stay Discovery, it is hereby ORDERED on this _____ day of _____, 2024, that the Joint Motion to Stay Discovery is GRANTED. Discovery is hereby stayed for a period of thirty days to July 29, 2024, and the deadlines set forth in the Court's Scheduling Order dated May 9, 2024 (ECF Doc. 52) are hereby extended by thirty days, as follows:

Event	Modified Deadline
Plaintiff's Rule 26(a)(2) expert disclosures	September 3, 2024
Defendants' Rule 26(a)(2) expert disclosures	September 30, 2024
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	October 14, 2024
Rule 26(e)(2) supplementation of disclosures and responses	October 21, 2024
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Dated: _____, 2024

Honorable Theodore D. Chuang
United States District Judge