

**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 EXTEND STAY OF 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 extend the current stay of discovery for an additional thirty days, to August 28, 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. Pursuant to a Joint Motion to Stay Discovery filed with the Court on June 27, 2024, the parties jointly requested a thirty-day stay of discovery in order to facilitate the exchange of information and their settlement discussions with Judge Quereshi. *See* ECF Doc. 64. The Court granted the parties' joint motion on June 28, 2024, pursuant to an Order Granting Joint Motion to Stay Discovery. *See* ECF Doc. 65.

The parties have made progress since the Court granted their motion and wish to conserve their resources while focusing on continuing their settlement discussions with Judge Quereshi's assistance. Accordingly, the parties jointly and respectfully request that the Court extend the current stay of discovery for an additional thirty days, to August 28, 2024, together with a corresponding extension of thirty days of the other deadlines modified pursuant to the Court's Order Granting Joint Motion to Stay Discovery dated June 28, 2024. The current deadlines and proposed modified deadlines are set forth in the table below.

Event	Current Deadline	Proposed Modified Deadline
Plaintiff's Rule 26(a)(2) expert disclosures	September 3, 2024	October 3, 2024
Defendants' Rule 26(a)(2) expert disclosures	September 30, 2024	October 30, 2024
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	October 14, 2024	November 13, 2024
Rule 26(e)(2) supplementation of disclosures and responses	October 21, 2024	November 20, 2024
Completion of Discovery; submission of Post-Discovery Joint Status Report, see Part V	November 4, 2024	December 4, 2024
Requests for Admission	November 12, 2024	December 12, 2024
Notice of Intent to File a Pretrial Dispositive Motion	November 18, 2024	December 18, 2024

Respectfully submitted,

Rachel M. Clattenburg

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Attorneys for Plaintiff Li Fen Yao

Dated: July 26, 2024

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2024 I caused the foregoing Joint Motion to Extend Stay of Discovery to be filed with the Court using CM/ECF which serves a copy on all counsel of record.

/s/Stephen M. Plotnick
Stephen M. Plotnick

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ORDER GRANTING JOINT MOTION TO EXTEND STAY OF DISCOVERY

Upon consideration of the parties’ Joint Motion to Extend Stay of Discovery, it is hereby ORDERED on this _____ day of _____, 2024, that the Joint Motion to Extend Stay of Discovery is GRANTED. Discovery is hereby stayed for a period of thirty days to August 28, 2024, and the deadlines set forth in the Court’s Order Granting Joint Motion to Stay Discovery dated June 28, 2024 (ECF Doc. 65) are hereby extended as follows:

Event	Modified Deadline
Plaintiff’s Rule 26(a)(2) expert disclosures	October 3, 2024
Defendants’ Rule 26(a)(2) expert disclosures	October 30, 2024
Plaintiff’s rebuttal Rule 26(a)(2) expert disclosures	November 13, 2024
Rule 26(e)(2) supplementation of disclosures and responses	November 20, 2024
Completion of Discovery; submission of Post-Discovery Joint Status Report, see Part V	December 4, 2024

Requests for Admission	December 12, 2024
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Dated: _____, 2024

Honorable Theodore D. Chuang
United States District Judge