

September 10, 2022

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Rusis et al. v. International Business Machines Corp., Civil Action No. 1:18-cv-08434-VEC-SLC

Dear Judge Caproni:

Plaintiff and Defendant International Business Machines Corporation (“IBM”) jointly submit this letter motion to stay this proceeding. The parties have reached a tentative resolution, and Plaintiff anticipates filing stipulations of dismissal pursuant to Fed. R. Civ. P. 41 in the coming weeks. As such, the parties respectfully request a full stay of the above captioned proceeding, including suspension of all pending deadlines. The parties further request that Your Honor issue no further decisions, including any decisions relating to Plaintiffs’ pending motion for leave to amend the complaint (Dkt. No. 277) and Plaintiffs’ motion for separate and final judgment (Dkt. No. 278). The parties agree that a stay will further the interests of judicial economy and efficiency and facilitate the final resolution of this matter. The parties further agree to file either stipulations of dismissal or a status report by November 8, 2022.

If this joint request for a stay meets with Your Honor’s approval, a “So Ordered” line is provided below for the Court’s convenience.

Respectfully submitted,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
Counsel for Plaintiffs

/s/ Matthew W. Lampe
Matthew W. Lampe
Counsel for Defendant

cc: All counsel of record (via ECF)

Page 2

IT IS SO ORDERED.

DATED: _____

Hon. Valerie E. Caproni
United States District Judge