

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAQUALA WILLIAMS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Case No. 1:21-cv-09326-JSR

**STIPULATION AND PROPOSED
ORDER**

WHEREAS, the parties to this action have reached a resolution as to all terms and have an agreement that the parties intend to sign;

WHEREAS, Plaintiff may not sign the agreement until October 28, 2022, in compliance with Section 5-336 of the New York General Obligations Law;

WHEREAS, the parties hereby agree to dismiss this action without prejudice on the terms set forth below and respectfully request that the Court adjourn at this time sine die the trial scheduled to begin November 7, 2022 and all related pre-trial deadlines;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties that the above-captioned action shall be dismissed in its entirety without prejudice to Plaintiff's right to re-open this action within thirty (30) days of the date this dismissal is so ordered if the resolution is not consummated. If this action is not re-opened within thirty (30) days, the action shall be dismissed with prejudice, with no award of counsel fees or costs by the Court to either side.

VLADECK, RASKIN & CLARK,

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Date: 10/24/22

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Attorneys for Defendant

Date: 10/24/22

SO ORDERED,



Honorable Judge Jed S. Rakoff

Dated: October 24, 2022