

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JENNY SHIPTOSKI, on behalf of
herself and similarly situated
employees,
Plaintiff,

v.

SMG GROUP, LLC,
Defendant.

3:16-cv-01216-RDM

STIPULATED SCHEDULING ORDER

Now that the deadline for individuals to opt-in to the conditionally certified collective has passed and a total of approximately 94 individuals (“Plaintiffs”) have joined this action, the parties respectfully request that the Court endorse the following discovery plan:

1. Defendant will file its anticipated motion to transfer this action to the Eastern District of Pennsylvania by August 15, 2018, and Plaintiffs will file opposition papers in accordance with the Local Civil Rules.
2. On or before September 15, 2018, Defendant will produce all documents and data that concern or pertain to the work hours and compensation of all Plaintiffs and other individuals employed in Pennsylvania and falling within the putative Rule 23 class.
3. Defendant may depose up to 20 Plaintiffs.

4. All discovery must be completed by January 18, 2019.
5. The following motions must be filed by February 22, 2019: (i)

Plaintiffs' anticipated motion for Rule 23 class certification of the putative class of Pennsylvania employees; (ii) Plaintiffs' anticipated motion for "second-stage" certification of the conditionally certified FLSA collective; and (iii) Defendant's anticipated summary judgment motion.

Agreed this 9th day of August, 2018 by and between:

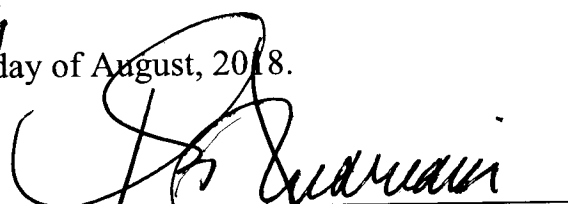
FOR DEFENDANT:

Brian P. McCafferty
Kenney & McCafferty, P.C.

FOR PLAINTIFFS:

/s/ Peter Winebrake
Winebrake & Santillo, LLC

SO ORDERED this 9th day of August, 2018.



Hon. Robert D. Mariani