



Philip C. Federico
410-421-7777
pfederico@lawbmf.com

May 4, 2026

VIA CM/ECF

The Honorable Stephanie A. Gallagher
United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street, Chambers 7C
Baltimore, MD 21201
(410) 962-7780

Re: *Chaney v. Perdue Farms, Inc.*, No. 1:24-cv-02975 – Joint Motion to Stay

Dear Judge Gallagher:

Following the parties' joint request of a motion to stay from March 19, 2026, and pursuant to this Court's order, the parties in *Chaney v. Perdue Farms, Inc.*, No. 1:24-cv-02975, have engaged in a pre-mediation process designed to explore mediation to resolve this dispute. The parties have agreed to schedule a multi-day mediation with the Honorable William G. Connelly (Ret.). To focus on mediation, the parties jointly request a continued **stay of all deadlines in this case through August 3, 2026**. The parties agree that the stay shall not prohibit either party from seeking third-party discovery.

The parties propose to file with the Court a status report on **August 3, 2026**, that advises of the status of mediation, and in the event that mediation is unsuccessful, the parties will propose a modified scheduling order to govern the case as it proceeds.

Respectfully Submitted,

/s/ Philip C. Federico

Philip C. Federico
Counsel for Plaintiffs

/s/ J. Douglas Baldridge

J. Douglas Baldridge
Counsel for Defendants
(Signed by Philip C. Federico with
permission of J. Douglas Baldridge)

CC: All counsel of record through CM/ECF

SO ORDERED.

Hon. Stephanie A. Gallagher
United States District Judge

Date