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March 19, 2026

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VIA CM/ECF

Hon. 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. 1:2024-cv-02975 – Joint Motion to Stay

Dear Judge Gallagher:

The parties in *Chaney v. Perdue Farms, Inc.*, No. 1:2024-cv-02975, have agreed in principle to explore mediation to resolve this dispute. To focus on mediation, the parties jointly request a **45-day stay of all deadlines** in this case. During the stay, the parties will confer with a mediator to determine if a more formal mediation session is advisable. 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 May 4, 2026**, that either (1) requests a continued stay in furtherance of the mediation, or (2) proposes a modified scheduling order to govern the case as it proceeds.

Sincerely,

/s/
J. Douglas Baldridge
Counsel for Defendants

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

CC: All counsel of record through CM/ECF

SO ORDERED.

Hon. Stephanie A. Gallagher
United States District Judge

Date