

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
RAKESH KUMAR, Ph.D. ,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 1:15-cv-00120 (JDB)
)	
GEORGE WASHINGTON UNIVERSITY,)	
)	
Defendant.)	
_____)	

**JOINT MOTION TO STAY
ORDER FOR INITIAL SCHEDULING CONFERENCE
AND FILING OF JOINT RULE 16.3 REPORT**

Plaintiff Dr. Rakesh Kumar and Defendant George Washington University (together, the “Parties”) jointly move the Court to stay the Order for Initial Scheduling Conference and their obligation to file their Joint Rule 16.3 Report. In support hereof, the Parties state as follows:

1. On May 2, 2016 the Court entered an Order for Initial Scheduling Conference. The scheduling conference was set for May 26, 2016. Pursuant to the applicable Local Civil Rules and Federal Rules of Civil Procedure, the parties were required to confer and then file their Joint Rule 16.3 Report no later than May 23, 2016.

2. Because the Parties were actively engaged in mediation and had had substantive settlement discussions on their own, the Parties filed, and the Court granted, their Joint Motion to stay the scheduling conference originally set for May 26, 2016. The Scheduling Conference was rescheduled to August 2, 2016 and the Parties’ Joint Rule 16.3 Report is due today, July 28, 2016.

3. Earlier today the Parties signed a settlement agreement resolving this action. However, because the settlement agreement contains a brief revocation period (to comply with certain statutory obligations), the settlement will not become immediately effective. If the agreement is not revoked, Plaintiff will file a Stipulation of Dismissal with prejudice no later than August 9, 2016. If the agreement is revoked, the Parties will notify the Court and request that a date be set for the Initial Scheduling Conference.

WHEREFORE, Plaintiff Dr. Rakesh Kumar and Defendant George Washington University respectfully request the Court to grant their Joint Motion To Stay Order For Initial Scheduling Conference And Filing Of Joint Rule 16.3 Report, to cancel the August 2, 2016 Initial Scheduling, and to relieve them of their obligation to file the Joint Rule 16.3 Report currently due July 28, 2016.

Respectfully submitted,

Dated: July 28, 2016

COHEN SEGLIAS PALLAS GREENHALL &
FURMAN, P.C.

/s/ Paul S. Thaler
Paul S. Thaler (Bar No. 04704)
1828 L Street, NW
Suite 705
Washington, D.C. 20036
(202) 466-4110
pthaler@cohenseglias.com
Attorneys for Plaintiff Dr. Rakesh Kumar

Barbara Van Gelder
Catherine R. Reilly
Cozen O'Connor
1200 19th Street, NW
Washington, DC 20036
(202) 912-4800
bvangelder@cozen.com
creilly@cozen.com
*Attorneys for Defendant George Washington
University*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joint Motion To Stay Order For Initial Scheduling Conference, and proposed Order, was served upon the following this 28th day of July, 2016, via the Court's Electronic Filing System:

Barbara Van Gelder
Catherine Reilly
Cozen O'Connor
1200 19th Street, NW
Washington, DC 20036
bvangelder@cozen.com
creilly@cozen.com

/s/ Paul S. Thaler
Paul S. Thaler