



denittislaw.com

So Ordered this 2nd day of January 2024.

s/ Zahid N. Quraishi
ZAHID N. QURAISHI
UNITED STATES DISTRICT JUDGE

December 21, 2023

5 Greentree Centre
525 Route 73 North, Suite 410
Marlton, NJ 08053
P: 856.797.9951 | F: 856.797.9978

1515 Market Street, Suite 1200
Philadelphia, PA 19102
P: 215.564.1721 | F: 215.564.1759

315 Madison Ave., 3rd Floor
New York, NY 10017
P: 646.979.3642

Via ECF Only

The Honorable Zahid N. Qurashi, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

Re: Corsi, et al. v. Cellco Partnership d/b/a Verizon Wireless, et al.
Civil Action No. 3:22-cv-4621-ZNQ-RLS

Allen, et al. v. Cellco Partnership d/b/a Verizon Wireless, et al.
Civil Action No. 3:23-cv-1138-ZNQ-RLS

Your Honor:

By consent of all parties, Plaintiffs' counsel are writing to the Court to advise that on December 15, 2023, the New Jersey Superior Court, in an action entitled Esposito, et al. v. Cellco d/b/a Verizon Wireless, Docket No. MID-L-6360-23, granted preliminary approval of a proposed nationwide class action settlement which, if given final approval at a Fairness Hearing scheduled for March 22, 2024, will resolve all claims pleaded in these Corsi and Allen, as well as all other proposed class actions currently pending against Verizon related to the "Administrative Charge." See Order Granting Preliminary Approval Dated December 15, 2023 in Esposito (attached hereto). If the proposed class action settlement is approved by the New Jersey Superior Court on March 22, 2024, the parties have agreed that the complaints in Corsi and Allen will be voluntarily dismissed immediately thereafter. Accordingly, all parties to this matter have agreed to jointly request that Your Honor administratively stay these two pending federal matters until April 1, 2024. At that time, if the proposed class action settlement has been approved by the New Jersey Superior Court, Plaintiffs in both these federal actions will be filing a voluntary dismissal of those actions.

Respectfully submitted,

DeNITTIS OSEFCHEN PRINCE, P.C.


STEPHEN P. DeNITTIS



SPD: jra