

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CLAUDIA NEWTON and BRANDY LEANDRO,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

R.C. BIGELOW, INC. and DOES 1 through 10,
Defendants.

No. 2:22-cv-05660-LDH-SIL

**STIPULATION AND JOINT MOTION
TO STAY LITIGATION BASED ON
SETTLEMENT AND FORTHCOMING
MOTION FOR PRELIMINARY
APPROVAL**

Plaintiffs Claudia Newton and Brandy Leandro, on behalf of themselves and the Classes (“Plaintiffs”) and Defendant R.C. Bigelow, Inc. (“Bigelow”) (collectively, “the Parties”), by and through their respective counsel of record, hereby stipulate to the following:

RECITALS

WHEREAS, on July 14, 2025, the Parties participated in a mediation session with Jed Melnick, but a settlement was not reached. ECF No. 56. Therefore, the Parties proceeded with litigation.

WHEREAS, the Parties continued to engage in settlement discussions through the mediator, and on June 9, 2026, the Parties accepted a mediator’s proposal that will resolve this matter on a classwide basis in its entirety, subject to the Court’s approval.

WHEREAS, the Parties intend to promptly begin drafting a long form settlement agreement that will be presented to the Court for preliminary approval.

WHEREAS, there are currently no hearing or trial dates scheduled, but there is a briefing schedule in place regarding the Parties’ respective motions for summary judgment, including a deadline of June 18, 2026 for the Parties to file summary judgment motions.

WHEREAS, the Parties have met and conferred, and hereby stipulate, subject to the Court's approval (for all issues requiring such approval), as follows:

STIPULATION

1. All current proceedings in this action shall be stayed, and any dates or deadlines for the Parties to file summary judgment briefing, including those set forth in the Court's April 16, 2026 electronic order, shall be vacated.
2. The Parties shall work diligently to draft and execute a long form settlement agreement that will be presented to the Court for preliminary approval.
3. No later than July 27, 2026, Plaintiffs shall file an unopposed motion for preliminary approval, or if the motion cannot be filed by then, the Parties shall file a joint status report explaining the reason.

DATED: June 10, 2026

Respectfully submitted,
THE WAND LAW FIRM, P.C.

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Attorneys for Plaintiffs and the Classes

Dated: June 10, 2026

Respectfully submitted,
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Plaintiffs,

v.

R.C. BIGELOW, INC., *et al.*,

Defendants.

No. 2:22-cv-05660-LDH-SIL

**[PROPOSED] ORDER GRANTING STIPULATION AND JOINT MOTION TO STAY
LITIGATION BASED ON SETTLEMENT AND FORTHCOMING
MOTION FOR PRELIMINARY APPROVAL**

The Court has considered the Parties' Stipulation and Joint Motion to Stay Litigation Based on Settlement and Forthcoming Motion for Preliminary Approval, and good cause appearing, the Court hereby grants the Stipulation, and orders as follows:

1. All current proceedings in this action are hereby stayed, and any dates or deadlines for the Parties to file summary judgment briefing, including those set forth in the Court's April 16, 2026 electronic order, are vacated.
2. The Parties shall work diligently to draft and execute a long form settlement agreement that will be presented to the Court for preliminary approval.
3. No later than July 27, 2026, Plaintiffs shall file an unopposed motion for preliminary approval, or if the motion cannot be filed by then, the Parties shall file a joint status report explaining the reason.

IT IS SO ORDERED.

DATED: _____

Honorable LaShann DeArcy Hall
United States District Judge