

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Janine Wenzig and Catherine Kioussis,)	
)	
Plaintiffs,)	No. 1:19-cv-01367-MEM
)	
v.)	
)	
Service Employees International Union)	
Local 668,)	
)	
Defendant.)	
)	
)	

JOINT MOTION TO CONTINUE CASE MANAGEMENT CONFERENCE

AND NOW comes the Plaintiffs, Janine Wenzig and Catherine Kioussis, and the Defendant Service Employees International Union Local 668, who, by and through their undersigned Counsel, file this Joint Motion to Continue the Case Management Conference, and in support thereof state as follows:

1. Defendant filed its Motion to Dismiss the initial Complaint on October 7, 2019.
2. Plaintiffs filed their First Amended Complaint on October 28, 2019.
3. Defendant intends to file a new Motion to Dismiss the Amended Complaint.
4. This Court has Scheduled a Case Management Conference in this case

for November 13, 2019, in preparation for which the parties are to submit a Case Management Report by November 6, 2019.

5. In light of Plaintiffs' filing of their First Amended Complaint, and the Defendants forthcoming Motion to Dismiss, the parties do not feel it would be an efficient use of the Court's resources to move forward with the Case Management Conference at this time.
6. Since a ruling on the Motion to Dismiss would have a substantial effect on the need for discovery, preparation of expert testimony, class certification, and other determinations to be addressed in the Case Management Report, the parties feel they would be best prepared to make those determinations after the Motion to Dismiss is resolved.
7. The parties therefore propose that the Case Management Conference be continued until the next available date not less than 28 days following this Court's ruling on Defendant's Motion to Dismiss.

WHEREFORE, the parties respectfully request the Court to enter an Order, in the form attached hereto, Continuing the Case Management Conference until the next available date not less than 28 days after this Court's ruling on Defendant's Motion to Dismiss.

Dated: November 1, 2019

Brian K. Kelsey (Pro Hac Vice)
bkelsey@libertyjusticecenter.org
Reilly Stephens (Pro Hac Vice)
rstephens@libertyjusticecenter.org
Liberty Justice Center
190 South LaSalle Street, Suite 1500
Chicago, Illinois 60603
Telephone (312) 263-7668
Facsimile (312) 263-7702

William Messenger (Pro Hac Vice)
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Suite 600
Springfield, VA 22160
Telephone (703) 321-8510
Facsimile (703) 321-9319
wlm@nrtw.org

/s/P. Casey Pitts
SCOTT A. KRONLAND (pro hac vice)
P. CASEY PITTS (pro hac vice)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
E-mail: skronland@altber.com
cpitts@altber.com

Respectfully Submitted,

/s/ Charles O. Beckley, II
Charles O. Beckley, II
Pennsylvania Bar No. 47564
Beckley & Madden, LLC
212 N. Third St., Suite 301
Harrisburg, PA 17101
Telephone (717) 233-7691
Facsimile (717) 233-3740
cbeckley@pa.net

Attorneys for Plaintiffs

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 2019, a copy of the foregoing Joint Motion to Continue Case Management Conference was served on all Counsel of record via the Court's CM/ECF system.

/s/ Charles O. Beckley, II
BECKLEY & MADDEN, LLC
212 North Third Street, Suite 301
P. O. Box 11998
Harrisburg, PA 17108-1998
(717) 233-7691 (Telephone)
(717) 233-3740 (Facsimile)
cbeckley@pa.net