

However, it is plaintiffs' position that this case has already been substantially delayed, and that it is time to set a trial date that will hopefully ensure the resolution of this case by some time next year. While defendants are free to move for summary judgment at this juncture, this should not be a basis for staying discovery or postponing a schedule for the resolution of the case.

Accordingly, plaintiffs respectfully request that the Court set a status conference on these matters as soon as the Court's calendar permits.

Respectfully submitted,

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