

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DISTRICT**

**DANIEL RUDELLE, on his own
behalf and on behalf of those
similarly situated,**

Plaintiffs,

vs.

Case No. 3:14-cv-00873-MMH-MCR

**FLAGLER COUNTY SHERIFF'S
OFFICE and JAMES L. MANFRE
Individually and in his official capacity
as Sheriff of FLAGLER COUNTY
SHERIFF'S OFFICE,**

Defendants.

JOINT MOTION FOR TEMPORARY STAY

Plaintiff, DANIEL RUDELLE and Defendant, JAMES L. MANFRE, in his official capacity as Sheriff of Flagler County, Florida, by and through their respective undersigned counsel, and in accordance with Fed.R.Civ.P. Rule 6(b), hereby request an immediate stay of proceedings, (including obligations to respond to Defendant's Motion to Dismiss, Plaintiff's Motion to Conditionally Certify FLSA Collective Action, Plaintiff's Motion for Class Certification, and all other pending motions) for a period of up to sixty (60) days, to engage in formal mediation and settlement negotiations to determine whether the Parties can reach a resolution of the claims pending in this litigation. The Parties have scheduled mediation on December 3, 2014.

WHEREFORE, the Parties jointly respectfully request that the Court order an immediate stay of proceedings for a period of sixty (60) days.

Dated: October 23, 2014

/s/ Kimberly De Arcangelis Woods
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Respectfully submitted,

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