

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

James J. Aboltin and Pamela J. Knight,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

Jeunesse, LLC aka Jeunesse Global, Inc., a
Florida limited liability company, MLM Mafia,
Inc., a Nevada Corporation, Online
Communications, LLC, a Wyoming limited
liability company, Wendy R. Lewis, an
individual, Ogale “Randy” Ray, an individual,
Scott A. Lewis, an individual, Kim Hui, an
individual, Jason Caramanis, an individual,
Alex Morton, an individual, Kevin Giguere, an
individual, John and Jane Does 1-100,
individual natural persons, and ABC
Corporations, Companies, and/or Partnerships
1-20,

Defendants.

Case No. 6:17-cv-01624-PGB-KRS

STIPULATED MOTION TO STAY PENDING SETTLEMENT

Plaintiffs James J. Aboltin and Pamela J. Knight, (collectively, “Plaintiffs”), and Defendants Jeunesse, LLC aka Jeunesse Global, Inc. (“Jeunesse”), Wendy Lewis, Ogale Ray, Scott Lewis, Kim Hui, and Kevin Giguere (collectively, “Defendants”), hereby move the Court to stay proceedings pending a motion for preliminary approval of a class action settlement to be filed within 30 calendar days.

After extensive negotiations between the parties, including an all-day mediation overseen by Lizbeth Hasse, Esq., of JAMS, the Plaintiffs and Defendants have agreed in principle to the material terms of a class-wide settlement of all claims in this case. The parties now must draft

formal settlement documents and anticipate moving for preliminary approval of the class action settlement by August 1, 2018. They thus hereby stipulate and respectfully request that the Court enter an order staying all deadlines and proceedings in the case until after a ruling on the forthcoming motion for preliminary approval.

RESPECTFULLY SUBMITTED this 29th of June 2018.

Dickinson Wright PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 29, 2018, I served the foregoing document via e-mail and U.S. Mail upon all counsel of record in the following Service List below.

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