

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RILEY BENJAMIN,

Plaintiff,

v.

NICOLE COLBERT, *et al.*,

Defendants.

Civil Action No. 1:23-cv-02315-RCL

JOINT MOTION TO STAY LITIGATION

Given the Parties' cooperative efforts in this matter, Plaintiff Riley Benjamin and Defendants Reverends Nicole Colbert and Jimmie Allen, and Deputy Director Jacqueline Williams, jointly move for a 75-day stay of litigation, including briefing on Defendants' pending Partial Motion to Dismiss [20], so that the Parties may engage in settlement discussions. *See* Fed. R. Civ. P. 6(b)(1)(A). Rule 6(b)(1)(A) provides for extensions on a showing of good cause.

Good cause supports the requested stay. Currently, Plaintiff's opposition to Defendants' Partial Motion to Dismiss is due by October 27, 2023, and Defendants' reply is due November 3, 2023. The Parties have conferred and believe they may be able to resolve this matter through settlement. A stay would permit the Parties to actively engage in settlement negotiations and work towards resolution of the case without the need for further court involvement or litigation expense. The Parties propose that at the conclusion of the stay, they file a Joint Status Report informing the Court of the status of settlement and whether they believe an extension of the stay is warranted.¹

¹ The Parties request 75 rather than the more common 60 days, because a 60-day period would conclude during the week between the Christmas and New Year's Day holidays.

Dated: October 26, 2023

/s/ Scott Michelman

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