

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION  
CASE NO. 9:24-CV-80612-AMC**

**MARY JANE WHALEN, and  
CHRISTINE V. RONA**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**GUNSTER, YOAKLEY &  
STEWART, PA**

Defendant.

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**JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY ALL CASE DEADLINES**

Plaintiffs Mary Jane Whalen and Christine V. Rona and Defendant Gunster, Yoakley & Stewart, PA (collectively, the “Parties”) submit this Joint Notice of Settlement and Motion to Stay All Case Deadlines.

With the assistance of a mediator, the Parties have reached an agreement in principle to resolve this action in its entirety on a class-wide basis. The Parties are in the process of finalizing and documenting the terms of that settlement and respectfully request that the Court stay all case deadlines. The Parties request this stay to finalize the written settlement agreement and for Plaintiffs to submit the necessary Motion for Preliminary Approval.

The Parties submit that good cause exists for granting this Joint Motion, as set forth above, and that this Joint Motion is not filed for purposes of improper delay.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(A)(3), the undersigned certifies that Plaintiffs' counsel and Gunster's counsel have conferred regarding the relief sought in this motion, and all Parties join in this motion.

Dated: October 9, 2024

Respectfully submitted,

/s/ John Allen Yanchunis, Sr.

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 9, 2024, a true and correct copy of the foregoing has been furnished by electronic filing with the Clerk of the Court via CM/ECF, which will send notice of electronic filing to all counsel of record.

/s/ Kristine McAlister Brown

Kristine McAlister Brown