



The parties have consulted and are unable to resolve their remaining disputes to date. The parties will continue to make efforts to resolve the issues but request that the Court schedule a pretrial conference in front of Magistrate Judge Lynch to develop a trial order and schedule that will permit the parties to resolve the few remaining issues concerning this subfile proceeding. The parties request that the pretrial conference be schedule no earlier than the end of February to give the parties a final opportunity to resolve the outstanding issues between them.

Date: January 23, 2017

/s/ Andrew "Guss" Guarino

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 23, 2017, I filed the foregoing electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Electronic Filing to be served by electronic means.

/s/ Andrew "Guss" Guarino