

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Stanford Glaberson, et al.,)	Civil Action No. 03-6604
)	
Plaintiffs,)	The Honorable John R. Padova
)	
v.)	
)	
Comcast Corporation, et al.,)	
)	
Defendants.)	
)	

**CLASS PLAINTIFFS’
UNOPPOSED MOTION FOR STAY**

Class Plaintiffs move as follows for a stay of this case pending completion of consultations regarding the future course of proceedings relating to claims concerning conduct in the Boston and Chicago areas:

On August 19, 2013, Class Plaintiffs moved to recertify the case as a class action for a more compact Philadelphia-area class. Doc. 560. On November 12, 2013, the Court denied Comcast’s motion to strike the motion to recertify. Doc. 569. On January 15, 2014, Comcast filed papers in opposition to the Philadelphia recertification motion. Docs. 575-83. On January 24, 2014, the Court granted Class Plaintiffs until March 17, 2014, to submit responses to Comcast’s opposition papers. Doc. 586.

On February 6, 2014, the parties informed the Court that, as a result of arm’s-length negotiations and the help of independent mediator Eric D. Green, they had reached a tentative and non-binding understanding on some but not all terms of a potential settlement of the claims of the smaller Philadelphia-area class. As of the filing of this motion, the understanding on some but not all terms of a potential settlement remains tentative and non-binding. The parties also advised the Court

during the conference of their views regarding possible disposition of claims relating to Chicago-area and Boston-area conduct.

Consultations regarding the future course of proceedings relating to claims concerning conduct in the Boston and Chicago areas have taken longer than class counsel expected. Class Plaintiffs request a stay of this case pending completion of the consultations, submission of any appropriate implementing motions, and the Court's disposition of those motions.

Comcast does not oppose this motion. The parties will submit a joint status report to the Court on or before April 21, 2014.

Conclusion

Class Plaintiffs respectfully request the Court to stay this case pending completion of consultations with Class Plaintiffs and the filing of any appropriate implementing motions and the Court's ruling on them.

Respectfully submitted,

/s/ Barry Barnett

Barry Barnett
Daniel H. Charest
LeElle Krompass
SUSMAN GODFREY L.L.P.
901 Main Street, Suite 5100
Dallas, Texas 75202-3775
Tel: (214) 754-1900
Fax: (214) 754-1933

Samuel D. Heins
Vincent J. Esades
David Woodward
Jessica N. Servais
HEINS MILLS & OLSON, P.L.C.
310 Clifton Avenue
Minneapolis, MN 55403
Tel: (612) 338-4605
Fax: (612) 338-4692

Joseph Goldberg
FREEDMAN BOYD HOLLANDER
GOLDBERG IVES & DUNCAN, P.A.
20 First Plaza, Suite 700
Albuquerque, NM 87102
Tel: (505) 842-9960
Fax: (505) 842-0761

ATTORNEYS FOR CLASS PLAINTIFFS

CERTIFICATE OF CONFERENCE

On February 18, 2014, I spoke by telephone with Sheron Korpus, counsel of record for Comcast. Mr. Korpus advised me that Comcast does not oppose this motion for leave to file the Fourth Amended Complaint.

/s/ Barry Barnett

Barry Barnett

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on this day, February 19, 2014, he caused to be served copies of foregoing document on the following counsel by the Court's ECF system.

Sheron Korpus
KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP
1633 Broadway
New York, NY 10019
skorpus@kasowitz.com
(via ECF and email)

N. Norman Goldberger
BALLARD SPAHR ANDREWS &
INGERSOLL LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
may@ballardspahr.com
(via ECF and email)

Christopher Hockett
DAVIS, POLK & WARDWELL
1600 El Camino Real
Menlo Park, CA 94025
(via ECF and email)

Dana M. Seshens
DAVIS, POLK & WARDWELL
450 Lexington Avenue
New York, NY 10017
(via ECF and email)

/s/ Barry Barnett

Barry Barnett