

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**PAUL LOVE, on behalf of himself and
all others similarly situated,**

Plaintiff,

v.

**VIRGINIA LAND IMPROVEMENT
CORPORATION and CROSSING
PLACE TRANSPORT INC.,**

Defendants.

Case No. 1:19-cv-00252-TSE-TCB

**JOINT STIPULATION AND PROPOSED ORDER REGARDING DEFENDANTS'
ANSWER**

WHEREAS on March 4, 2019, Plaintiff Paul Love filed a class complaint (“Complaint”) on behalf of himself and similarly situated dump truck drivers alleging unpaid wage claims against Defendants Virginia Land Improvement Corporation and Crossing Place Transport, Inc. (collectively, “Defendants”);

WHEREAS Defendants generally deny liability for the claims alleged in the Complaint;

WHEREAS the Parties have reached a settlement in this matter and are in the process of seeking the Court’s approval of their signed Settlement Agreement;

NOW THEREFORE, the Parties, through their counsel, jointly stipulate that:


1. Defendants need not file an Answer addressing each specific allegation in the Complaint, unless the Court declines to approve the Settlement Agreement;

2. Defendants do not waive any defenses to Plaintiff’s claims or the claims asserted on behalf of the class;

3. In the event that the Court declines to approve the Settlement Agreement, the Parties intend to negotiate in good faith to reach an agreement with terms that are acceptable to the Parties and the Court. If the Parties are unable to reach an agreement with terms that are acceptable to the Parties and the Court, then Defendants will file a responsive pleading within twenty-one (21) calendar days after (i) the Court declines to approve a modified Settlement Agreement, or (ii) the Parties agree in writing that despite good faith efforts, they are unable to agree on a modified Settlement Agreement that is acceptable to the Parties and the Court (whichever is sooner).

IT IS SO STIPULATED.


Dated: March 8, 2019



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Dated: March 7, 2019



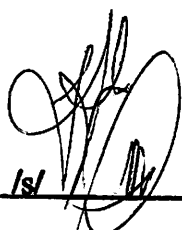
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* *pro hac vice* admission forthcoming

*Attorneys for Plaintiff Paul Love and proposed
Class Members*

IT IS SO ORDERED.

Dated: 3/13/19, ~~2018~~


/s/ _____
T. S. Ellis, III
United States District Judge