

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BETH VERMEER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	C.A. No. 21-1500-RGA
UNIVERSITY OF DELAWARE,	)	
	)	DEMAND FOR JURY TRIAL
Defendant.	)	

**STIPULATION AND [PROPOSED] ORDER  
RELATING TO PRE-TRIAL CONFERENCE**

Plaintiff Beth Vermeer (“Plaintiff”) and Defendant the University of Delaware (“Defendant”) (together, the “Parties”) by and through their undersigned counsel, respectfully file this stipulation pursuant to District Court Local Rule 16.3 relating to the pre-trial conference scheduled for January 12, 2024, at 9 a.m.

WHEREAS, Mr. Grygiel, who has been personally involved in Plaintiff’s trial preparation, resides in Clinton, New York, which is a five-hour drive from Wilmington, Delaware, and has been fighting an illness over the past two weeks, and

WHEREAS, Plaintiff’s other trial counsel, Matthew F. Boyer and Lauren P. DeLuca, will attend the pre-trial conference in person; and

WHEREAS, the Parties’ Joint Pre-Trial Order, proposed preliminary and final jury instructions, proposed voir dire, jury verdict form, and motions in limine are currently due to be filed on January 9, 2024, one day after the issuance of the Court’s Memorandum Opinion and Order on their cross motions for summary judgment;

IT IS HEREBY STIPULATED AND AGREED by the Parties, subject to the approval of the Court:

1. that Mr. Grygiel be permitted to attend and participate in the pre-trial conference telephonically, or if that is not technologically feasible, that he be excused from attending the pre-trial conference but permitted to participate fully at trial; and

2. that the time for the Parties to file their Joint Pre-Trial Order, proposed preliminary and final jury instructions, proposed voir dire, jury verdict form, and motions in limine (three in all) be extended from 5 p.m. on January 9, 2024, to 5 p.m. on January 10, 2024.

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*University of Delaware*

IT IS SO ORDERED this \_\_\_\_ day of January, 2024.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE