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March 21, 2022

VIA ECF

Honorable Cathy L. Waldor
United States Magistrate Judge
United States District Court
for the District of New Jersey
Frank R. Lautenberg U.S. P.O. & Courthouse
One Federal Square
Newark, New Jersey 07102

Re: James and Manuela Sines and Jennell Jones v. Darling Ingredients Inc.
Civil Action No.: 2:19-cv-19121-CCC-CLW

Dear Judge Waldor,

Pursuant to this Court's February 28, 2022 Order, I am writing on behalf of all parties to the above-referenced case to provide an update on the subpoenaed witnesses. Per the parties' agreement, Darling has served a second round of subpoenas on certain absent class members who provided Plaintiffs' counsel with a signed written statement in this case. As with the first set of subpoenas, some of the subpoenaed witnesses attended their depositions, while others did not. Given that numerous subpoenaed witnesses failed to attend their depositions, Darling is about to serve a third set of subpoenas containing a deposition date of April 28.

Darling has informed Plaintiffs that it reserves all rights with respect to absent class members who violate their subpoenas by failing to attend their depositions. This includes, but is not limited to, Darling's right to move to strike the written statements of any absent class member who violated a subpoena. Plaintiffs contend that Darling has no legitimate basis to seek to strike any absent class member's written statement and will oppose any effort by Darling to do so.

We appreciate the Court's assistance with this matter.

Respectfully submitted,

/s/ Steven Rosenwasser

Steven Rosenwasser
Counsel for Darling

/s/ Matt Robb

Matt Robb
Counsel for Plaintiffs

cc: Counsel of Record