

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

SHANNON Z. KOLNSBERG et al.,
Plaintiffs,

Case No. 3:25-cv-01515-OAW

v.

BOEHRINGER INGELHEIM USA
CORPORATION, et al.,
Defendants.

**JOINT STATUS REPORT AND MOTION TO SET PRELIMINARY APPROVAL
DEADLINE AND STAY PROCEEDINGS**

Pursuant to the Court's October 23, 2026 Order (ECF No. 76), Plaintiffs and Defendants jointly report that they have reached a settlement in principle and move under Federal Rule of Civil Procedure 16 for the scheduling relief set out below. In support, the parties state:

1. The parties participated in mediation with Robert A. Meyer on October 21, 2026. The mediation was successful, and the parties reached a settlement in principle to resolve this action, subject to completion of definitive settlement documents and Court approval under Federal Rule of Civil Procedure 23(e).

2. The parties are working to finalize the settlement agreement, plan of allocation, proposed notices, and supporting papers. They jointly request a December 7, 2026 deadline for Plaintiffs to file their motion for preliminary approval, including a request for certification of a settlement class.

3. In light of the settlement in principle, the parties do not presently seek adjudication of any merits or discovery dispute. The remaining work concerns settlement documentation and the approval process. The parties will promptly notify the Court if an issue arises that requires its intervention.

4. Plaintiffs' motion for class certification at ECF No. 53 remains pending. The parties request that it be held in abeyance and that the contemplated renewed motion for litigation class certification discussed in ECF No. 71 be deferred pending further order. Plaintiffs will address certification for settlement purposes in the preliminary-approval papers.

5. The parties jointly request a stay of further merits proceedings and litigation deadlines, including discovery and merits motion practice, pending the settlement approval process and further order of the Court. The stay would permit settlement documentation, agreed information exchanges needed for settlement approval or administration, all settlement-related filings, and compliance with Court orders concerning settlement.

6. Good cause exists for this relief. The parties acted promptly following mediation, and the requested schedule allows time to complete the documents needed for the Court's review while avoiding litigation expense that could be unnecessary if the settlement is approved. Both sides consent, and the requested stay preserves their positions if litigation must resume.

7. If Plaintiffs do not file the preliminary-approval motion by December 7, 2026, the parties will file a joint status report by that date explaining the circumstances and proposing further scheduling relief. If the settlement cannot be completed or approved, the parties will promptly confer and request an appropriate schedule for resuming litigation.

For these reasons, the parties respectfully request entry of the accompanying proposed order. This joint motion presents no disputed issue of law. Oral argument is not requested.

Dated: October 28, 2026

Respectfully submitted,

WALCHESKE & LUZI, LLC

/s/ Paul M. Secunda

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CERTIFICATE OF SERVICE

I certify that on October 28, 2026, I electronically filed the foregoing through the Court's CM/ECF system, which will provide notice to all counsel of record.

/s/ Paul M. Secunda

Paul M. Secunda