

February 6, 2025

**VIA ECF**

Hon. Wendy Beetlestone  
10614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: *ABEC, Inc. v. Eat Just, Inc. et al.*, No. 5:23-cv-01091 (E.D. Pa.)

Dear Judge Beetlestone:

We jointly write on behalf of Plaintiff ABEC, Inc., and Defendants Eat Just, Inc., and GOOD Meat, Inc. (collectively, the “Parties”), in the above-referenced matter.

The Parties have engaged in serious settlement negotiations over the past few months and have reached an agreement in principle regarding the framework for a settlement agreement and the material terms. However, due to the complex nature of the claims, defenses, and counterclaims, the Parties require additional time to draft a binding agreement. Therefore, the Parties respectfully request that the litigation and all case deadlines be stayed for a period of thirty (30) days to accommodate this effort.

In addition, the Parties respectfully request that the Court appoint a Magistrate Judge as settlement master to facilitate a final resolution. Even with the appointment of a Magistrate Judge, the Parties intend to diligently continue their ongoing discussions.

The Parties have every intention to resolve the case during this period. However, because the Parties expected to complete two fact depositions and resolve a number of discovery disputes with the Discovery Master this week, the Parties each wish to reserve their rights to resume discovery practice for these limited purposes should a settlement not be finalized.

We thank the Court for its assistance with respect to this effort.

Respectfully submitted,

/s/ Gaetano P. Piccirilli

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