

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

HOLLY LLOYD,

Plaintiff,

vs.

COVANTA PLYMOUTH RENEWABLE ENERGY,
LLC,

Defendant.

No. 2:20-cv-4330-HB

[Electronically filed]

JUDGE HARVEY BARTLE III

**ORAL ARGUMENT
REQUESTED**

**DEFENDANT'S MOTION TO ALLOW *EX PARTE* INTERVIEWS OF PUTATIVE
CLASS MEMBERS**

**FLORIO PERRUCCI STEINHARDT
CAPPELLI TIPTON & TAYLOR LLC**

Robert M. Donchez ID No: 209505
Robert Freedberg, ID No: 7855
60 West Broad Street, Suite 201
Bethlehem, PA 18018
(610) 691-7900

rdonchez@floriolaw.com
rfreedberg@floriolaw.com

BEVERIDGE & DIAMOND, P.C.

Michael G. Murphy (admitted *pro hac vice*)
477 Madison Avenue, 15th Floor
New York, New York 10022
(212) 702-5400

mmurphy@bdlaw.com

James B. Slaughter (admitted *pro hac vice*)
1350 I Street, N.W., Suite 700
Washington, DC 20005
(202) 789-6000

jslaughter@bdlaw.com

Collin Gannon (admitted *pro hac vice*)
201 North Charles Street, Ste 2210
Baltimore, MD 21201-4150
(410) 230-1300

cgannon@bdlaw.com

Attorneys for Defendant Covanta Plymouth Renewable Energy, LLC

March 15, 2021

PLEASE TAKE NOTICE that, pursuant to the Court's March 2, 2021 scheduling order (ECF No. 25), Defendant Covanta Plymouth Renewable Energy moves the Court to enter an order confirming Defendant's right to conduct *ex parte* interviews of putative class members without prior restraint. In support of its motion, Defendant incorporates by reference its memorandum of law in support.

Defendant requests that the Court permit oral argument.

Dated: March 15, 2021

Respectfully submitted:

BY: /s/ Robert M. Donchez

BY: /s/ Collin Gannon

**FLORIO PERRUCCI STEINHARDT
CAPPELLI TIPTON & TAYLOR LLC**

Robert M. Donchez ID No: 209505
Robert Freedberg, ID No: 7855
60 West Broad Street, Suite 201
Bethlehem, PA 18018
(610) 691-7900

rdonchez@floriolaw.com
rfreedberg@floriolaw.com

BEVERIDGE & DIAMOND, P.C.

Michael G. Murphy (admitted *pro hac vice*)
477 Madison Avenue, 15th Floor
New York, New York 10022
(212) 702-5400

mmurphy@bdlaw.com

James B. Slaughter (admitted *pro hac vice*)
1350 I Street, N.W., Suite 700
Washington, DC 20005
(202) 789-6000

jslaughter@bdlaw.com

Collin Gannon (admitted *pro hac vice*)
201 North Charles Street, Ste 2210
Baltimore, MD 21201-4150
(410) 230-1300

cgannon@bdlaw.com

Attorneys for Defendant Covanta Plymouth Renewable Energy, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2021 a true and correct copy of Defendant Covanta Plymouth Renewable Energy, LLC's Motion to Allow *Ex Parte* Interviews of Putative Class Members, memorandum in support, and proposed order were electronically filed via the Court's CM/ECF system, which will provide electronic notifications of such filing to all counsel of record.

Dated: March 15, 2021

Respectfully submitted,

BY: /s/ Collin Gannon

BEVERIDGE & DIAMOND, P.C.

Collin Gannon (admitted *pro hac vice*)
201 North Charles Street, Ste 2210
Baltimore, MD 21201-4150
(410) 230-1300
cgannon@bdlaw.com

*Attorney for Defendant Covanta Plymouth
Renewable Energy, LLC*