

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

TRAVELERS UNITED,

*Plaintiff,*

vs.

EXPEDITION 196, LLC, et al,

*Defendant.*

Case No.: 2022 CA 003089 B

Judge: Neal E. Kravitz  
Civil 2, Calendar 12

Next Event: ISC  
Date: 04/14/2023  
Time: 9:30 am  
Place: Courtroom 131

**JOINT MOTION FOR 60-DAY STAY PENDING MEDIATION**

The parties move this Court to stay this action for 60 days to allow them to make a substantive attempt to settle this case in its entirety through early mediation. In further support, the parties state:

1. This is an action for alleged violations of the District of Columbia Consumer Protection Procedures Act (“CPPA”). In its Complaint, Travelers United (“Travelers”) alleges that Cassandra De Pecol and Expedition 196, LLC (collectively “Ms. De Pecol”) violated the CPPA by, among other things, allegedly making misleading statements about being the first woman to travel to every country first. Ms. De Pecol denies making any misleading statements.

2. The 119-page Complaint presents a myriad of complex issues, including whether certain statements made on social media, and at other places, violate the CPPA.

3. Given this case's complexity, including the number of potential witnesses, statements, documents, records, etc. referenced in the Complaint, the parties will have to engage in substantial, costly, and protracted discovery.

4. In addition to the parties having to engage in extensive discovery, they will also have to engage in extensive and costly motions practice because, Ms. De Pecol intends to submit substantial filings, including a dispositive motion and an extensive counterclaim.

5. The parties want to avoid the exorbitant litigation fees and expenses by appearing for early mediation through the Court's Multi-Door Dispute Resolution Division.

6. The parties submit that a stay will allow them to make a substantive attempt at a resolution while (1) avoiding the fees, expense, and uncertainty of protracted litigation and (2) conserving judicial resources. Neither party will be prejudiced if the Court enters a stay.

7. The parties have contacted Multi-Door to obtain the next available mediation dates and are awaiting a response. If the Court grants the stay, the parties intend to schedule mediation within 30 days, or less.

8. If mediation is unsuccessful, the parties will move the Court to lift the stay and continue the litigation.

## REQUEST FOR RELIEF

For the above reasons, the parties respectfully ask the Court to grant this Motion, staying this matter and all current deadlines, including the deadline for Defendants to answer or otherwise respond to the Complaint, to allow the parties to make a substantive attempt at resolving this case in its entirety through mediation.

Dated this 28<sup>th</sup> day of February 2023

VEDA LAW LLC

/s/

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Albert Wilson Jr.  
D.C. Bar No. 486546  
5335 Wisconsin Ave., NW, Ste 440  
Washington, DC 20015  
Telephone: (240) 839-4153  
Fax: (202) 315-3494  
Email: awilson@vedalaw.com  
*Counsel for Defendant*

/s/

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Lauren Wolfe  
D.C. Bar No. 1048660  
2833 Alabama Ave., SE Unit 30736  
Washington, DC 20020  
Telephone: (202) 713-9596  
Email: lauren.wolfe@travelersunited.or  
*Counsel for Plaintiff*

## **CERTIFICATE OF SERVICE**

On February 28, 2023, the foregoing was served on all counsel or parties below via eFileDC and email.

Lauren Wolfe  
Travelers United  
2833 Alabama Ave SE Unit 30736  
Washington, DC 20020  
*Counsel for Plaintiff*

/s/

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Albert Wilson Jr.