

# MEMO ENDORSED

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June 27, 2007

**VIA TELECOPIER (212) 805-7906**

The Honorable Denny Chin  
Judge, United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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Re: Zipporah Films, Inc. v. Madison Square Garden, L.P.  
06 Civ. 6451 (DC)

Dear Judge Chin:

We represent plaintiff Zipporah Films, Inc. in the above-referenced action. The parties are continuing to work toward settlement and are making substantial progress. Pursuant to your Honor's Individual Practices, we write on behalf of both parties to request an adjournment of the Zipporah Films, final pretrial conference and an extension of the deadline to complete fact discovery in this case.

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The scheduled date for the final pretrial conference is August 10, 2007 and for the close of fact discovery is July 2, 2007. This is the second request for an extension by either party. The parties propose that the pretrial conference be rescheduled for September 6, 2007. We require an extension of that amount of time because after we reach an agreement, which we both believe is attainable before that date, there will be a period in which certain agreed to procedures will need to occur in order to have the matter finalized. In the event that the parties are unable to finalize the settlement before the requested date, we will provide the Court with an update on settlement at the conference, and will propose a discovery deadline for the Court's consideration.

We attach a proposed Revised Scheduling Order. Both parties have consented to the proposed order.

We thank the Court for its consideration of this request.

Respectfully submitted,

*Deanna R. Waldron*  
Deanna R. Waldron

DRW/bj  
enc.

cc: Robert L. Raskopf (via telecopier/(212) 849-7100)  
Jonathan Marcus (via telecopier/(212) 849-7100)  
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*Adjourned to 9/2/07,  
at 10:30 am. All discovery,  
fact and expert, is to be completed  
by then. SO ORDERED.*