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MEMO ENDORSED

March 17, 2020

Via ECF

Honorable Edgardo Ramos
 United States District Judge
 Southern District of New York
 40 Foley Square
 New York, NY 10007

The application is granted
 denied

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written over a horizontal line.

Edgardo Ramos, U.S.D.J
 Dated: March 17, 2020
 New York, New York

Re: Sherman v. Town of Chester
 Docket No. 12 cv 00647 (ER)(GWG)
 File No. 080038

Your Honor:

This firm represents defendant in this matter. The parties recently re-engaged the Court's mediation program in the hope of resolving this case, and were assigned a mediator who is in the process of scheduling our session. On behalf of both parties, we write to request a temporary stay of discovery while the parties pursue settlement. This is our first request to stay discovery.

As the Court is aware, this case has a long and complicated history. Since discovery began, the parties have been exchanging and reviewing upwards of 20,000 documents, and we understand Plaintiff has a significant number of additional documents to produce. The case is expensive to litigate, and will become more expensive as the parties move towards depositions and engage experts. In addition to further anticipated delays resulting from the coronavirus pandemic, Mr. Diederich's father passed away last week. This stay would not only conserve resources, but allow the parties to focus their time and attention on reaching a settlement. If settlement talks are unsuccessful, we will promptly submit a joint proposed scheduling order to complete the remaining discovery.

Thank you for your consideration of this matter.

Respectfully submitted,

SOKOLOFF STERN LLP

A handwritten signature in black ink, appearing to read 'Steven C. Stern', is written below the firm name.

STEVEN C. STERN

cc: All counsel via ECF