



May 29, 2020

By ECF

Hon. George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: JUN 01 2020

Re: Joint request for modification of briefing schedule
Bascuñan, et al. v. Elsaca, et al., 15 Civ. 2009

Dear Judge Daniels:

I write with the consent of defendants' counsel and on behalf of all parties to request a modification of the pre-trial schedule that the Court authorized in September 2019.

Due to the Covid-19 pandemic, which has affected all parties as well as their counsel, the parties will not be able to complete fact discovery by June 5, 2020 as originally contemplated in our Joint Rule 26(f) Status Report and Discovery Plan, filed August 29, 2019[ECF No. 124] (the "Discovery Plan"). Given the international nature of this case, and the location of parties, as well as many witnesses and documents, abroad, we also believe that the pandemic will pose ongoing challenges to our completion of discovery. We therefore request that the Court modify the pre-trial deadlines set forth in the Discovery Plan as follows:

Deadline for completion of fact discovery: March 5, 2021
Deadline for exchange of expert reports, if any: April 23, 2021
Deadline for completion of expert discovery: May 24, 2021
Deadline for motion for summary judgment: June 24, 2021 if expert discovery is taken;
April 12, 2021 if no expert discovery is taken.

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Counsel for the parties are available at the Court's convenience should the Court have any questions or concerns about the proposed modified schedule.

Respectfully submitted,

/s/ Robin L. Alperstein
Robin L. Alperstein