

KASOWITZ BENSON TORRES LLP

1633 BROADWAY
 NEW YORK, NEW YORK 10019
 (212) 506-1700
 FAX: (212) 506-1800

ATLANTA
 HOUSTON
 LOS ANGELES
 MIAMI
 NEWARK
 SAN FRANCISCO
 SILICON VALLEY
 WASHINGTON DC

KEVIN A. CYRULNIK
 DIRECT DIAL: (212) 506-3368
 DIRECT FAX: (212) 656-1792
 KCYRULNIK@KASOWITZ.COM

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #:
 DATE FILED: 06/24/2020

MEMO ENDORSED

June 23, 2020

VIA CM/ECF

The Honorable Valerie Caproni
 United States District Court
 Southern District of New York
 Thurgood Marshall United States Courthouse
 Courtroom 443
 40 Foley Square
 New York, NY 10007

Application GRANTED.

SO ORDERED.

Date: 06/24/2020

HON. VALERIE CAPRONI
 UNITED STATES DISTRICT JUDGE

Re: Marino v. Coach, Inc., No. 1:16-cv-1122 (VEC)(OTW), and coordinated cases
1:16-cv-3677, 1:16-cv-3773, and 1:16-cv-5320

Dear Judge Caproni:

We represent defendant Coach, Inc. in the above actions. On May 29, 2020, the Court set a June 19, 2020 deadline to file a joint letter addressing certain issues with the parties' proposed settlement. (*See* May 29, 2020 Order, Dkt. 123.) On June 19, 2020, the parties sought and received an extension of the deadline to file their joint letter to Tuesday, June 23, 2020.

The parties have acquired additional data and prepared responses to each of the Court's questions regarding the class settlement, but have not yet determined how to resolve the potential inconsistency in the class definition set forth in the Settlement Agreement and the Long Form Notice. The parties have conducted several meet and confer teleconferences on this sole remaining issue and are diligently working to reach a resolution. Accordingly, all parties respectfully request that the Court extend the deadline for a response to the Court's May 29, 2020 Order from June 23, 2020, to June 30, 2020.

Respectfully,

s/ Kevin A. Cyrulnik
 Kevin A. Cyrulnik

cc: Counsel of Record (via ECF)