Via ECF May 10, 2023

Honorable Ona T. Wang United States Magistrate Judge MEMO ENDORSED. 500 Pearl Street New York, NY 10007

Re: Jablonski v. Special Counsel Inc., 16 Civ. 05243

Dear Judge Wang,

Plaintiff Terri Jablonski ("Plaintiff) and Defendant ADO Professional Solutions, Inc., f/k/a Special Counsel, Inc. ("SCI") submit this letter jointly to request an adjournment of the status conference currently scheduled for May 17, 2023. This is the first adjournment request.

Pursuant to Your Honor's Order on May 8, 2023 (ECF 280), the open discovery issues remaining are the Special Interrogatories referenced in ECF 277, and the Court's resolution of the parties' cross-motions to depose attorneys Matthew Clarke and Maria Jablonski, for which briefing will be complete on May 30, 2023.

The parties jointly request that the status conference scheduled for next Wednesday, May 17, 2023, be rescheduled to a date after June 14, 2023, when briefing is complete on the parties' remaining cross-motions and after the Special Interrogatories are served. Counsel for the parties are available on June 15 and June 21.

Sincerely,

/s/ Maria Jablonski

/s/ Daniel S. Goldstein

Maria Jablonski Attorney for Plaintiff P.O. Box 1186. Pearl River, NY 10965

(646)549-5427

Daniel S. Goldstein Smith, Gambrell & Russell, LLP Attorneys for Defendant

Application GRANTED. The May 17, 2023 status conference is hereby adjourned to Thursday, June 15, 2023 at 3 p.m.

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SO ORDERED.

Ona T. Wang U.S.M.J.

5/11/23