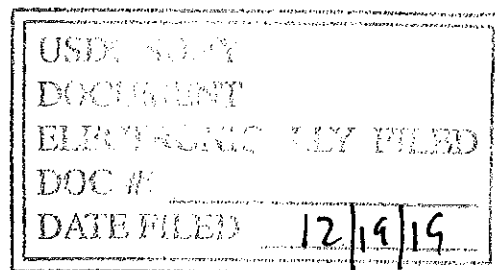


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December 19, 2019

**RECEIVED ENDORSED**Stephanie Teplin  
Partner  
(212) 336-2543  
steplin@pbwt.com**By ECF**The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007**Re: *Citizens Union of the City of New York, et al. v. The Attorney General of the State of New York, No. 16-cv-09592***

Dear Judge Cote:

We represent the ACLU Plaintiffs in the above-captioned matter. We write on behalf of all parties in this consolidated matter regarding Plaintiffs' pending motions for attorneys' fees and costs. *See* Dkt. 180, 183, 186

The parties participated in a settlement conference before Magistrate Judge Parker on November 22, 2019, and reached an agreement in principle to resolve all of the pending motions for attorneys' fees and costs shortly thereafter. Since that time, the parties have been working diligently to finalize a settlement agreement that reflects the terms of their agreement.

In light of their agreement to resolve the issues presented by the motions for attorneys' fees and costs, the parties request that the Court stay the December 20, 2019 deadline for Plaintiffs to file reply submissions on the pending motions. *See* Dkt. 190. A brief stay will allow the parties to finalize the settlement agreement without incurring unnecessary time and expense associated with further briefing. The parties expect to finalize their settlement agreement in the coming weeks, allowing the motions to be withdrawn. In the event the parties are unable to do so, the parties will update the Court on the status of settlement negotiations no later than January 8, 2020.

*S. Kates letter due*  
*4/8/20*  
*Denise Cote*  
*12/19/19*

Respectfully submitted,

/s/ Stephanie Teplin  
Stephanie Teplin