



KILPATRICK TOWNSEND & STOCKTON LLP
www.kilpatricktownsend.com

Application granted.
Dated: April 22, 2020

Suite 2800, 1100 Peachtree Street NE
Atlanta, GA 30309-4528
t 404 815 6500 f 404 815 6555

April 22, 2020


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

direct dial 404 815 6572
direct fax 404 541 3240
CHenn@kilpatricktownsend.com

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Fujifilm North America Corporation v. PLR IP Holdings, LLC et al.*,
Case No. 1:17-cv-08796-NRB (S.D.N.Y.)

Dear Judge Buchwald:

We write jointly on behalf of all parties, including Fujifilm North America Corporation and Fujifilm Corporation (collectively, “Fujifilm”) and PLR IP Holdings, LLC and PLR Brand Services, LLC, and Counterclaim Plaintiffs Impossible B.V. and Impossible America Corp. d/b/a Polaroid Originals (collectively, “Polaroid”).

On March 12, 2020, this Court entered an Order staying all discovery for a period of 45-days, through April 27, 2020, directing “the parties to fully cooperate with each other to maximize progress in this case consistent with objective issues related to COVID-19.” (ECF 91.) The parties have been in frequent communication and have worked cooperatively throughout the stay.

Due to ongoing complications from the global pandemic, both locally and in other jurisdictions where the parties’ witnesses reside, the parties jointly request that the Court extend the stay **through May 29, 2020**. The parties will continue to cooperate during the continued stay, and will ensure that depositions resume once the stay ends, even if they must be conducted remotely via videoconference. We are available at the Court’s convenience to discuss any concerns.

Respectfully submitted,

/s/ James J. DeCarlo
James J. DeCarlo
Greenberg Traurig
200 Park Avenue
New York, NY 10166
decarloj@gtlaw.com

Counsel for Fujifilm

/s/ R. Charles Henn Jr.
R. Charles Henn Jr.
Kilpatrick Townsend
1114 Sixth Avenue
New York, NY 10036
chenn@ktslaw.com

Counsel for Polaroid