

Dear Judge Hellerstein:

We represent Defendant Metropolis Group, Inc. in the above-captioned action. We write on behalf of, and with consent of, counsel for all parties to request adjournments of the non-expert discovery deadline, currently set for December 27, 2019, and the second case management conference, currently scheduled for January 10, 2020. After engaging in certain limited discovery, the parties have agreed to engage in private mediation in an attempt to resolve this matter, subject to the Court's consent and the grant of adjournments as requested herein. Accordingly, the parties request that the non-expert discovery deadline be adjourned to April 30, 2020 and that the second case management conference be adjourned to a date to be set by the Court in May 2020. These proposed adjourned dates are intended to allow the parties time to pursue mediation and to complete non-expert discovery should mediation fail. There have been no prior adjournments, or requests for adjournments, of the non-expert discovery deadline or the second case management conference.

Respectfully submitted,

L, Donald Prutzman