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October 12, 2020

VIA ECF

Honorable Alvin K. Hellerstein, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

*The conference is adjourned
until November 13, 2020 at
10:00 a.m.*

X [Signature]

Re: Mail America Communications, Inc. v. World Healing Center Church, Inc.
Civil Case No.: 1:18-cv-8481 (AKH)

10/13/2020

Dear Judge Hellerstein:

We write as counsel for the Plaintiff to update Your Honor in advance of the status conference that is currently scheduled with the Court on October 16, 2020 at 10:00 AM, and to respectfully request a four-week adjournment of said conference.

Progress in this case has been significantly impacted by the coronavirus pandemic. Plaintiff served interrogatories and requests for documents on defendant on June 3, 2020. Defendant has not yet responded to these written discovery requests, and has advised that its client representatives have until recently been unable to retrieve the requested information as a result of losing access to their office and files for months because of the pandemic. Similarly, while counsel for plaintiff and defendant have attempted between them to discuss settlement of the claim at issue in this case, defendant's inability to complete their record review has prevented these discussions from proceeding in a meaningful and productive way.

The parties believe that this case will benefit from additional time to allow them to undertake a comprehensive effort to settle the issues present herein. Counsel for defendant currently advises that he expects to obtain the outstanding items required for the parties to productively engage in these negotiations in the next two weeks. Accordingly, the parties respectfully request that the October 16 status conference be adjourned four weeks, to November 13, 2020, to allow them additional time to resolve the issues that exist between them.

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The Court's consideration of this request is greatly appreciated.

Respectfully submitted,

STEVENS & LEE

/s/ Bradley L. Mitchell

Bradley L. Mitchell

BLM:blm
cc via ECF: Peter M. Levine, Esq.