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July 29, 2022

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 08/01/2022

Re: *Kaplan, et al. v. Lebanese Canadian Bank*, 08-cv-7253-GBD-KHP
Lelchook, et al. v. Lebanese Canadian Bank, et al. 18-cv-12401-GBD-KHP

Dear Judge Parker:

We represent Plaintiffs in the above-referenced actions. On June 30, 2022, Your Honor entered scheduling orders in both cases, which directed that: “[t]he parties shall file a joint proposed ESI plan and protective order by July 29, 2022 for the Court’s review and adoption.” (*Kaplan*, DE 171, p. 2; *Lelchook*, DE 73, p. 2). We write with the consent of Defendants to request that the parties’ deadline to file the joint proposed ESI Plan and Protective Order be extended until August 12, 2022.

Good cause exists for the enlargement sought. The parties are attempting to resolve their disagreements regarding the proposed ESI plan and protective order but significant gaps remain. The parties are nonetheless hopeful that further discussions will resolve or at least narrow their disagreements, and thereby obviate or limit the need for the Court to hear and resolve the dispute. The enlargement is thus likely to preserve the resources of both the Court and the parties. The enlargement will not delay these actions because no discovery productions are scheduled in the next couple of weeks. We also note that pursuant to the scheduling orders (*id.*), the parties will be submitting a joint status letter on August 12, 2022. Thus, the enlargement requested would make the proposed ESI plan and protective order due at the same time as the joint status letter.

This request is filed with the consent of Defendants’ counsel, Mitchell R. Berger, Esq.

We thank the Court for its consideration.

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.
8/01/2022

Respectfully,

Robert J. Tolchin
Robert J. Tolchin

Cc: All counsel of record by ECF