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February 15, 2021

VIA ECFThe Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl St., Courtroom 12A
New York, NY 10007Re: Hillel v. Obvio Health USA, Inc., et al.; Case No. 1:20-cv-04647(LAP)(DCF)

Dear Judge Preska:

We represent Plaintiff Iris Hillel and write jointly with all Defendants (together, "Parties") to propose a schedule for proceeding with discovery upon request of the Court. See Dkt. 61.

1. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed no later than March 1, 2021.
2. All fact discovery is to be completed no later than October 15, 2021.
3. Initial requests for the production of documents shall be served by March 15, 2021.
4. Initial Interrogatories shall be served by March 15, 2021.
5. Depositions shall be completed by September 15, 2021.
6. Requests to admit shall be served by September 15, 2021.
7. All expert discovery, including disclosure of expert reports, production of underlying documents, and depositions shall be completed by November 19, 2021.
8. Deadline to add or join parties or claims shall be March 31, 2021.

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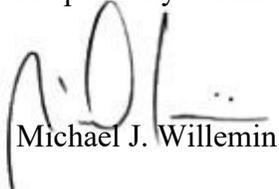
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We thank the Court for Your Honor's time and consideration of this matter.

Respectfully submitted,



Michael J. Willemin

cc: Counsel of record *via* ECF

The discovery plan proposed above is approved. The parties shall appear for a status conference on May 19, 2021 at 9:00 a.m.

SO ORDERED.

Dated: February 16, 2021
New York, New York



LORETTA A. PRESKA, U.S.D.J.