

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/12/20
---



**THE KATZ LAW FIRM - Ga.** LLC

## MEMORANDUM ENDORSED

STEPHEN M. KATZ  
Email: [smkatz@katz.legal](mailto:smkatz@katz.legal)

1225 Johnson-Ferry Road  
Building 100 • Suite 125  
Marietta, Georgia 30068-5407  
Telephone: 770.988.8181  
Facsimile: 770.988.8182  
Internet: [www.katz.legal](http://www.katz.legal)

10 November 2020

By ECF

The Honorable Gregory H. Woods  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Sims v. Sony Music Entertainment, et al.*, 20-cv-05322

Dear Judge Woods:

Our firm, along with James L. Walker, Jr., represents Plaintiff Andre Sims in the above-referenced action.

After communication with opposing counsel, who represents all but one of the defendants, we seek an adjournment of the initial pretrial conference and the deadline to submit a joint letter and proposed case management plan.

The parties have exchanged substantial information in an effort to resolve the case. Opposing counsel agrees that that it makes sense to delay the submission of the documents until the defendants file their responses to the Complaint, in the event that we are not able to resolve the case.

In accordance with Rule 1.E of Your Honor's Individual Rules of Practice, we write to request an adjournment of the initial pretrial conference, currently scheduled for November 11, 2020.

While this is a second request for an adjournment, the defendants Answers are not due until December 7, 2020. The request is made in good faith after communication with opposing counsel.

Based on the discussions and information exchanged thus far, we believe there is a substantial chance the parties will resolve this case.

Accordingly, in light of the due date of Defendants' responses to the Complaint and the progress we have made thus far toward a resolution, we request an adjournment of the pretrial conference until after Defendants' responses to the Complaint are filed.

Very truly yours,

**/s Stephen M. Katz**

Stephen M. Katz

smk/


cc: Mr. Donald Zakarin  
Mr. James J. Walker, Jr.

Application granted. The initial pretrial conference scheduled for November 18, 2020 is adjourned to December 17, 2020 at 3:00 p.m. The joint letter and Case Management Plan described in the Court's July 14, 2020 order, Dkt. No. 2, are due no later than December 10, 2020.

SO ORDERED.

Dated: November 12, 2020  
New York, New York

---

  
GREGORY H. WOODS  
United States District Judge