

CLIFTON BUDD & DeMARIA, LLP

ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING
350 FIFTH AVENUE, 61ST FLOOR
NEW YORK, NY 10118

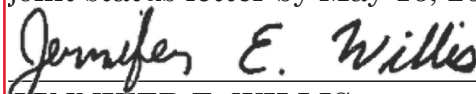
TEL (212) 687-7410
FAX (212) 687-3285
www.cbdlm.com

IAN-PAUL A. POULOS
PARTNER
E-MAIL: IAPOULOS@CBDM.COM

VIA ECF

Hon. Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

The request to adjourn all current deadlines and dates is **GRANTED**. The parties are to provide the Court with either the agreement and motion or a joint status letter by May 16, 2025. SO ORDERED.



JENNIFER E. WILLIS
UNITED STATES MAGISTRATE JUDGE
April 24, 2025

Re: *Odate v. AHRC Health Care, Inc.*
20-cv-08292-JW

Dear Judge Willis:

The undersigned represents Defendant AHRC Health Care, Inc. in the above-referenced action. We write jointly with Class Counsel. As indicated in the letter dated April 21, 2025 (ECF Doc. 289), the parties have reached a class-wide settlement in principle to resolve all claims in this action and are in the process of preparing a settlement agreement to present to Your Honor for approval on May 16, 2025.

Given that there are numerous pending motions, upcoming pretrial deadlines, and a trial date rapidly approaching, the parties respectfully request that all deadlines be adjourned *sine die* pending Court review of their forthcoming settlement agreement—except for the Motion for Leave to File Late Opt-Out From Class Action pursuant to FRCP § 60(b). *See* ECF Doc. 285-288. The deadlines and motions that are pending will become irrelevant once the Parties file their settlement agreement and motion for approval on May 16, 2025. Between now and May 16, 2025, the parties would like to dedicate their time and attention to resolving this case.

Thank you for Your Honor's time and consideration.

Respectfully submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for AHRC Health Care, Inc.

By: 

Ian-Paul A. Poulos

CC: All Counsel of Record