Diego Beekman Mutual Housing Association Housing Development Fund Corp...ual Insurance Company et al Doc. 25

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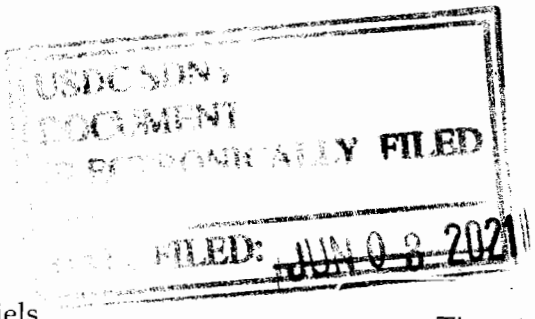

June 3, 2021

SO ORDERED

The status conference is adjourned from June 8, 2021 to September 28, 2021 at 9:45 a.m.

JUN 08 2021

HON. GEORGE B. DANIELS

Via ECF
Hon. George B. Daniels
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

RE: ***Diego Beekman Mut. Housing Ass'n Housing Dev. Fund Corp. v. Liberty Mut. Ins. Co., et al.*, No. 1:20-cv-10912**

Dear Judge Daniels:

This firm represents Defendants Liberty Mutual Insurance Company and American Economy Insurance Company ("Defendants") in the above-referenced insurance coverage dispute. As discussed on a recent call with Chambers, we submit this joint status report and request for: (1) an adjournment of the initial pretrial conference scheduled for June 8, 2021 at 9:45 a.m.; and (2) a 60-day extension of fact discovery to allow the parties time to respond to written discovery and explore mediation.

As the Court is aware, the parties accepted the Court's proposed case management plan (ECF No. 15). The parties have served (and are in the process of responding to) written discovery requests. The parties are also discussing mediation. Currently, there are no pending motions or issues that require the Court's attention at this time. Accordingly, the parties respectfully request: (1) an adjournment of the initial pretrial conference scheduled for June 8, 2021; and (2) a 60-day extension of fact discovery to allow the parties time to respond to written discovery and explore mediation.

This request is made on consent. This is the first request for an extension of discovery deadlines.

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Please do not hesitate to contact us, if the Court requires any additional information. The parties are also available on June 8, 2021 at 9:45 a.m., if the Court would like to go forward with the conference as scheduled and discuss the parties' request.

Respectfully submitted,

/s/ Gerald P. Dwyer, Jr.

Gerald P. Dwyer, Jr.
Cara C. Vecchione
ROBINSON & COLE LLP
Attorneys for Defendants Liberty Mutual Insurance Company and American Economy Insurance Company

cc: Counsel of record (via ECF)