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July 16, 2021

MEMORANDUM ENDORSEMENT

Via ECF

Magistrate Judge Kevin Nathaniel Fox
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Stella Garson v. Victoria's Secret Stores, LLC
Docket No.: 1:20-cv-10938
Date of Loss: 6/26/19
Our File No.: 502-1516

Dear Honorable Judge Fox:

We represent the defendant in this matter, Victoria's Secret Stores, LLC. We write this letter to request an adjournment of the settlement conference currently scheduled before Your Honor on July 27, 2021 at 2:30 pm. This request is made with the consent of Plaintiff's counsel.

The reason for the request is due to unanticipated delays with discovery. This was set in motion as a result of the parties trying to come to an agreement with respect to the language of a discovery confidentiality agreement and protective order proposed by Victoria's Secret Stores, LLC. This issue has recently been worked out and Judge Cronan so ordered the agreement on July 12, 2021.

At this time, Victoria's Secret is working on providing the items of discovery that were upheld pending the agreement. In light of the delays, Judge John Cronan extended discovery deadlines, with a new fact discovery deadline now set for October 1, 2021, and a new expert discovery deadline now set for November 30, 2021.

Currently, the depositions of the parties are set for August 10, 2021 and August 30, 2021. In light of the unanticipated delays, we would request an adjournment of the settlement conference until after the depositions have been completed. We do not believe that negotiations before the deposition will be fruitful.

LESTER SCHWAB KATZ & DWYER, LLP

July 16, 2021

Page 2

Thank you for your courtesies. Should you have any questions, please feel free to contact my cell at (917) 842-8252.

Very truly yours,

s/Allyson B. Belmont
ALLYSON B. BELMONT
Of Counsel

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7/16/21

Application granted. The parties shall confer and thereafter, in a joint writing, shall propose to the Court three dates on which all parties are available to attend a settlement conference.

SO ORDERED:

Kevin Nathaniel Fox

Kevin Nathaniel Fox, U.S.M.J.