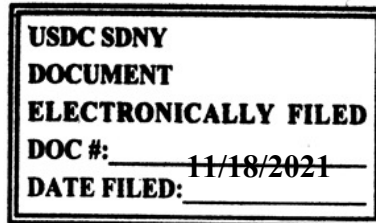




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November 18, 2021

**BY ECF**

The Honorable Katherine H. Parker  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**APPLICATION GRANTED: Counsel is directed to file a Status letter in January.**

**APPLICATION GRANTED**

**Hon. Katharine H. Parker, U.S.M.J.**

11/18/2021

Re: *Zakaiem v. Ohanissian et al*, Civil Action No. 1:21-cv-00074-PAE-KHP

Dear Judge Parker:

We recently appeared on behalf of defendants and write on behalf of both parties to request two items of relief. First, the parties request the entry of the attached confidentiality order that we have agreed upon to govern the exchange of confidential documents in this action. Second, because the action was stayed and the exchange of documents is occurring shortly, the parties request that the deadline for fact discovery be extended by four months from November 15, 2021 to March 15, 2022.

Thank you for your consideration.

Respectfully Submitted,

Efrem Schwalb

cc: All counsel of record (By ECF)