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Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: *Upsolve, Inc., et al., v. James, 22-CV-627 (PAC)*

Dear Judge Crotty:

We represent Plaintiffs Upsolve, Inc. and Rev. John Udo-Onkon in connection with the above-referenced matter. We respectfully request that the Court hold all pending deadlines in abeyance pending the resolution of the Second Circuit appeal in this action. Defendant consents in this request.

On May 24, 2022, the Court issued an Opinion and Order granting Plaintiffs' Motion for a Preliminary Injunction (ECF 68). On June 22, 2022, Defendant filed a Notice of Appeal of this Court's Order to the United States Court of Appeals for the Second Circuit (ECF 77). Pursuant to this Court's scheduling order (ECF 72), the current deadline to submit a Civil Case Management Plan and for Defendant to respond to Plaintiffs' complaint is Friday, July 15, 2022 (ECF 72).

In light of Defendant's pending appeal, which will likely address the central legal issues in this action, it is unnecessary and would be inefficient to proceed simultaneously in this Court while Defendant's appeal is pending in the Second Circuit. To that end, Plaintiffs respectfully request that the Court hold all pending deadlines in abeyance until the resolution of Defendant's appeal in the Second Circuit. Defendant consents in this request. If this request is granted, Plaintiffs further seek leave to file a status report regarding further proceedings in this Court within 14 days of the issuance of the mandate from the Second Circuit.

Respectfully submitted,

/s/ Gregory Silbert
Gregory Silbert

cc: Counsel of Record (via ECF)