



Jeffrey Shooman
77 Water Street, Suite 2100
New York, New York 10005
Jeffrey.Shooman@lewisbrisbois.com
Direct: 646.989.9433

January 18, 2023

VIA ECF AND EMAIL

(CronanNYSDChambers@nysd.uscourts.gov)

Hon. John P. Cronan, U.S.D.J.

United States District Court

for the Southern District of New York

Daniel Patrick Moynihan

United States Courthouse

500 Pearl Street

New York, NY 10007-1312

Re: Unity Electric Co, Inc. v. Microdesk, Inc.
Civil Case No.: 1:22-cv-01066-JPC

Dear Judge Cronan:

We represent defendant Microdesk, Inc. in the above-referenced matter. We file this letter motion, jointly with plaintiff Unity Electric Co., Inc., to request a stay of discovery. The parties are on the verge of executing a mediation agreement with Neal M. Eiseman, Esq. The agreement calls for two mediation sessions in May and June 2023.

The current schedule for discovery is as follows:

- Each party's responses to written discovery requests and document production shall be exchanged on or before February 24, 2023.
- Fact Discovery to be Completed by April 28, 2023.
- Expert Discovery to be Completed by June 30, 2023.
- Joint Status Letter to the Court due July 7, 2023.

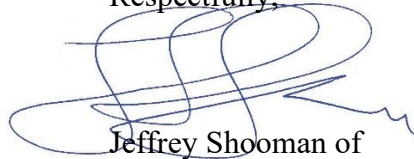
The parties previously have asked for and received two adjournments on September 19, 2022 and November 22, 2022. (ECF Nos. 36 and 38). Also, defendant's motion to dismiss is sub judice.

Hon. John P. Cronan, U.S.D.J.
January 18, 2023
Page 2

Therefore, the parties respectfully request that the case be stayed through June 30, 2023. We will notify the Court by that date to advise whether there is a settlement or to propose a new discovery schedule.

Thank you for your attention to this matter.

Respectfully,



Jeffrey Shooman of
LEWIS BRISBOIS BISGAARD &
SMITH LLP

cc: All Counsel of Record (via email)

The request is granted. The case is stayed pending mediation. By June 30, 2023, the parties shall file a notice of voluntary dismissal or a status letter updating the Court as to mediation and, if applicable, proposing dates for a new discovery schedule.

SO ORDERED.

January 18, 2023
New York, New York



JOHN P. CRONAN
United States District Judge