

**MEMO ENDORSED****By ECF**

Hon. Jessica G. L. Clarke  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

# Kennedys

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November 14, 2023

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**Re: *Roanoke Insurance Group, Inc. a/s/o ICAT Logistics, Inc. v. Polar Air Cargo Worldwide, Inc.***  
**Case No.: 1:23-cv-7128**

Dear Judge Clarke,

Our office represents Plaintiff Roanoke Insurance Group, Inc. a/s/o ICAT Logistics, Inc. (“Roanoke” or “Plaintiff”) in the within action. We write pursuant to Your Honor’s Order of August 15, 2023 (Dkt. No. 4) and the Court’s November 11, 2023 Order instructing that the parties submit a joint letter and proposed Civil Case Management Plan and Scheduling Order no later than November 14, 2023.

We write jointly and with the consent of counsel for Defendant Polar Air Cargo Worldwide, Inc. (“Polar” or “Defendant”), to advise the Court of the parties’ advanced settlement negotiations in this case, and in an effort to conserve both the parties’ and judicial resources, jointly request an adjournment of the November 16, 2023 Initial Conference. This is the parties first request for an adjournment or extension of time in this case and is made with the consent of all parties.

The parties make this request, as we believe that this matter can be amicably resolved without the need for further judicial intervention.

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November 14, 2023

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In view of the foregoing, the parties' respectfully request an adjournment to a date convenient to the Court. Pursuant to Your Honor's Individual Rules and Practices, the parties propose any of December 15, 19 or 20, 2023 as mutually agreeable alternative conference dates. In the event settlement is not achieved, the parties will submit a joint letter and proposed case management plan to the Court no later than one week prior to the rescheduled Initial Conference.

We thank the Court for its consideration.

Respectfully submitted,

*Frank Jordan*

**Frank Jordan**  
Partner  
for Kennedys

cc: Counsel of Record (via ECF)

Application GRANTED. The conference previously scheduled for November 16, 2023 is hereby rescheduled to **December 20, 2023 at 10:00 a.m.** The joint letter and proposed Case Management Plan shall be filed by **December 13, 2023.**

SO ORDERED.

*Jessica Clarke*

JESSICA G. L. CLARKE  
United States District Judge

Dated: November 15, 2023  
New York, New York