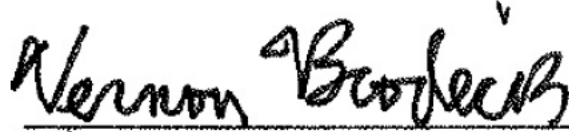


HANG & ASSOCIATES, PLLC

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SO ORDERED: 6/4/2024**HON. VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE**

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VIA ECF

Hon. Vernon S. Broderick, U.S.M.J.

United States District Court

Southern District of New York

40 Foley Square

New York, NY 11354

The request for a stay is denied at this time. However, the 60-day extension request is granted. The parties are directed to file an Amended Case Management Plan and Scheduling Order by no later than June 11, 2024.
SO ORDERED.

Re: Owens v. Ghair Inc. et al

Civil Docket No. 1:23-cv-10779-VSB

Consent Joint Letter Motion to Stay Discovery

Dear Judge Broderick:

This office represents Defendants Ghair Inc. and Long Human Hair Factory Inc. ("Defendants") in the above-referenced matter. Together with plaintiff, the parties jointly request this court to stay the ongoing fact-discovery pending the parties' participation in the Court's annexed mediation program; alternatively, the parties request a 60-day extension to complete fact discovery through August 18, 2024.

The current due date for the fact-discovery to conclude is June 19, 2024, per Case Management Plan and Scheduling Order dated February 22, 2024 (D.E. 16). This is the first time for the parties to request an enlargement of time to exchange discovery responses or to stay the discovery process pending the mediation process. The impetus for this request is that the parties both agreed to adjourn the mediation conference to June 21, 2024, and the preference of the parties to conserve resources in anticipation of the ADR process.

We appreciate the Court's time and attention to this matter.

Honorable Vernon S. Broderick, U.S.M.J.
June 3, 2024
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Respectfully submitted,
Hang & Associates, PLLC
By: s/ Ge Qu
Ge Qu, Esq.
Attorneys for Defendants