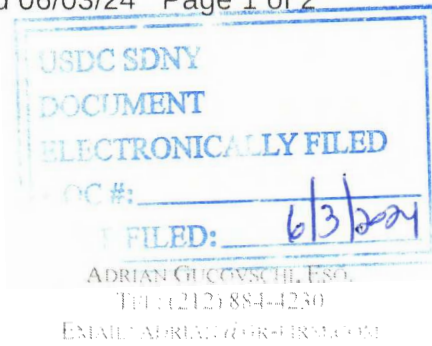




140 BROADWAY, SUITE 4667
NEW YORK, NY 10005
WWW.GR-FIRM.COM



June 3, 2024

Via ECF

The Honorable Colleen McMahon
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2550
New York, New York 10007-1312

ok

Colleen McMahon
6/3/2024

Re: **Beasley v. fuboTV, Inc., 1:24-cv-00711 (CM) (RWL):**
Joint Request for 45-day Extension of Stay

Dear Judge McMahon:

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Local Rule 7.1(d), and the Court's Individual Practices, Plaintiff Catherine Beasley ("Plaintiff") and Defendant FuboTV, Inc. ("Defendant") (jointly, the "Parties"), request that the Court briefly extend the stay in this matter (ECF 18), which expires on June 6, 2024, for an additional forty-five (45) days to July 21, 2024 and adjourn the pretrial conference scheduled for May 2, 2024 at 10:00 am following the termination of the additional 45-day period.

The Parties respectfully request this extension of the stay while they work toward facilitating a resolution of this matter. The Parties believe that judicial economy and the interests of the Parties would be served by an extension of the stay of the action while the Parties pursue resolution. Prior to the expiration of the stay, the Parties will jointly file a status report to inform the Court of their progress and propose a briefing schedule with the timing of Plaintiff's opposition to Defendant's Motion to Compel Arbitration (ECF 11) and Defendant's reply.

The Court has not yet issued a scheduling order, and this requested 45-day extension of the stay of all case deadlines, including Plaintiff's April 22 deadline to respond to Defendant's Motion to Compel Individual Arbitration and Defendant's April 29 deadline to file its reply in support of same Motion, does not affect any other dates.

Respectfully submitted,

/s/ Adrian Gucovschi
Adrian Gucovschi
Gucovschi Rozenshteyn, PLLC



140 Broadway, Suite 4667
New York, NY 10005
Tel: (212) 884-4230
adrian@gr-firm.com
Counsel for Plaintiff

CC: All Counsel of Record (Via Ect)