v.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LITTLELEAF PROPERTIES II, LLC,

Plaintiff

No. 24-CV-892 (RA)

MT. HAWLEY INSURANCE COMPANY,

Defendant

JOINT LETTER REGARDING AGREED SECOND AMENDED CASE MANAGEMENT PLAN AND SCHEDULING ORDER

To the Hon. Ronnie Abrams, United States District Judge:

By agreement, the parties jointly request entry of the attached Second Amended Case Management Plan and Scheduling Order. The amended order would extend the close of fact discovery and expert discovery—currently scheduled for November 3, 2024 and January 28, 2025, respectively—and all remaining deadlines and settings by approximately 90 days. The parties further agree that plaintiff will designate its expert witnesses by January 13, 2025, and defendant will designate its expert witnesses on February 14, 2025.

There has been one prior request for an extension of time, which was granted in connection with a recent surgery and extended rehabilitation undertaken by plaintiff's counsel. The current request is made in good faith and not for the purpose of delay. Rather, the parties are jointly requesting this relief (1) as an agreed resolution of a discovery dispute relating to interrogatories and materials requested in May 2024 and only recently produced and (2) to facilitate scheduling the deposition of defendant's corporate representative whose workload and availability has been significantly impacted by the sudden influx of claims arising from both Hurricane Helene and Hurricane Milton.

/s/ Christopher J. Edwards, Jr.

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Attorneys for Plaintiff

Application granted. The Court will so order the Second Amended Case Management Plan. No further adjournments will be granted absent good cause.

SO ORDERED.

Hon. Ronnie Abrams.

October 24, 2024

/s/ Greg K. Winslett

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