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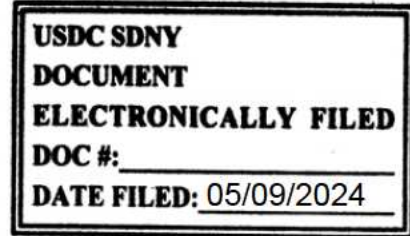
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May 8, 2024

**BY EMAIL**

The Honorable Robert W. Lehrburger  
 U.S. District Court – S.D.N.Y.  
 500 Pearl Street  
 New York, NY 10007



**Re: *Ninette Israni v. Wells Fargo, N.A. and Wells Fargo & Co.***  
**Case No. 24-cv-01471**

Dear Judge Lehrburger:

We represent Plaintiff Ninette Israni in the above-captioned action. We write in response to Defendants April 24 letter requesting permission to file a motion to dismiss for lack of subject matter jurisdiction or, in the alternative, to transfer venue to New Jersey.

On May 2 and May 7, we met and conferred with Defendants' counsel about their proposed motion to see if we could resolve the issue without a motion being filed. After those discussions the parties respectfully request that the Court stay this matter for 60 days. During that time, I will ascertain the process for representing Ms. Israni in New Jersey (either by getting admitted *pro hac vice* or being admitted to practice in New Jersey). If the case does not settle during that time, the parties consent to the case being transferred to the United States District Court in Newark, New Jersey.

During that time, I request that the parties be allowed to participate in the SDNY's ADR program. Defendants do not join in that request because they believe that ADR is unlikely to be helpful at this juncture. However, I believe that the SDNY ADR program often helps parties reach a settlement and will be very helpful in this particular case.

The request to stay is granted. The case is stayed until July 9, 2024, at which time the stay will automatically lift unless further extended by the Court. If the case has not settled by July 9, 2024, the parties shall file a joint motion to transfer the case to New Jersey. If the case settles during the stay period, the parties shall so inform the Court within five days of settlement. In the interim, the Court will refer the matter to the SDNY mediation program.

Respectfully submitted,

/s/ Rishi Bhandari

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 Rishi Bhandari

SO ORDERED:

05/09/2024



HON. ROBERT W. LEHRBURGER  
 UNITED STATES MAGISTRATE JUDGE