

ORIGINAL

# Littler

## MEMO ENDORSED

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March 11, 2025

VIA ECF

Hon. Louis L. Stanton  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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Re: *Marsh & McLennan Agency LLC v. Stedman*, Case No 1:24-cv-01671-LLS

Dear Judge Stanton:

This law firm represent Plaintiff March & McLennan Agency LLC in the above-referenced case. We write to request extensions of the deadlines in this case to permit the parties to complete discovery and depositions. The parties have engaged in extensive discovery, resulting in Plaintiff's production of over 7,200 pages and Defendant's production of over 500 pages. However, more discovery is needed. Plaintiff is collecting and will produce additional documents related to its lost profits. Plaintiff will also seek documents from Defendant's current employer via subpoena. And, finally, the parties still need to schedule and take depositions. Accordingly, Plaintiff asks for the Court to enter the following revised discovery schedule, to which Defendant consents:

Fact Discovery Deadline	June 9, 2025
Plaintiff Expert Report	July 9, 2025
Defendant Rebuttal Report	August 11, 2025
Expert Discovery Deadline	September 11, 2025
Plaintiff's Pre-Trial Order Materials	October 3, 2025
Pre-Trial Order	November 3, 2025

Granted and  
So Ordered  
Louis L. Stanton  
3/11/25

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The parties also request that the Court adjourn the Final Pretrial Conference scheduled for March 28, 2025 to a date in December, or thereafter, following the parties' completion of discovery and submission of a pre-trial order.

This is the parties' first request for an adjournment of the above dates. We thank the Court for its consideration.

Respectfully,

*/s/ Shawn Matthew Clark*

Shawn Matthew Clark

cc: All counsel of record (via ECF)