

**HOLWELL SHUSTER & GOLDBERG** LLP

425 Lexington Ave., 14<sup>th</sup> Floor  
New York, New York 10017  
Tel: (646) 837-5151  
Fax: (646) 837-5150  
www.hsgllp.com

Vincent Levy  
(646) 837-5120  
vlevy@hsgllp.com

May 10, 2024

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10017

Re: *Everlake Life Ins. Company v. Freedom U.S. Acquisition Corp. et al.*, No. 24-cv-3264 (RA)

Dear Judge Abrams:

I write respectfully on behalf of all parties to request that the Court defer certain initial deadlines until after the Dispositive Motions, as defined below, are resolved and that the initial status conference, currently scheduled for May 24, 2024, be rescheduled for a date in June.<sup>1</sup>

Plaintiff filed the above-referenced action in New York state court on March 22, 2024. DE 1-1. Defendants removed the case to federal court on April 29, 2024. DE 1. On April 30, the Court issued an order setting forth three initial deadlines (DE 6):

- May 17, 2024: Parties jointly submit a status letter
- May 17, 2024: Parties jointly submit a proposed case management plan and scheduling order
- May 24, 2024: All parties appear for an initial status conference

On May 7, the Court adopted the parties proposed briefing schedule for the motion to dismiss, which contemplates briefing ending by July 8, 2024. DE 11. It is also our understanding that in conjunction with the motion to dismiss briefing that Plaintiff will file a dispositive motion of its own which will likely address many of the same issues that will be raised in the motion to dismiss, collectively the “Dispositive Motions.”

The parties will jointly submit a status letter by May 17 per the Court’s order. However, because the Dispositive Motions may resolve the case in whole or part, the parties believe they

---

<sup>1</sup> I am counsel for all defendants other than The Governor and Company of the Bank of Ireland (the “Bank of Ireland”). Counsel for the Bank of Ireland and counsel for plaintiff consent to my writing on their behalf.

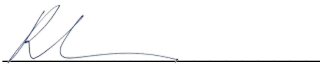
should be decided first, and then the parties can discuss and submit a proposed case management plan and scheduling order after. Therefore, we respectfully request that the Court defer any requirement to submit a proposed case management plan and scheduling order until after the Dispositive Motions are decided.

As to the May 24 conference, undersigned counsel has a conflict based on a preexisting court engagement (a federal jury trial in Seattle) and respectfully asks the Court to reschedule the conference to a date after June 1, assuming the Court still deems the conference necessary.

Respectfully submitted,

Application granted. The parties shall file a joint status letter no later than May 17, 2024. The parties' deadline to file a case management plan is adjourned. The initial status conference originally scheduled for May 24, 2024 is also adjourned. Following a decision on the Dispositive Motions, the Court will schedule a deadline for the joint submission of a case management plan and a date for the status conference, should they be necessary.

SO ORDERED.



Hon. Ronnie Abrams  
May 10, 2024

/s/ Vincent Levy  
Vincent Levy

Michael Shuster  
Vincent Levy  
Jack Millman  
**Holwell Shuster & Goldberg LLP**  
425 Lexington Ave., 14th Floor  
New York, New York 10017  
Tel: (646) 837-5151  
Email: mshuster@hsgllp.com  
vlevy@hsgllp.com  
jmillman@hsgllp.com

*Attorneys for Freedom U.S.  
Acquisition Corp.; Vispero, S.Á.  
R.L.; AI Squared In, Inc.; AI2  
Holdings Inc.; Algorithmic  
Implementations, Inc.; Enhanced  
Vision Systems, Inc.; Freedom  
Scientific Holdings Corp.; Freedom  
Scientific Inc.; Interactive  
Accessibility, Inc.; TPG Interactive,  
LLC; Optelec U.S. Inc.; Freedom  
Scientific BLV Group, LLC;  
Optelec GmbH; Optelec Herring  
Holdings B.V.; Optelec Holdings  
B.V.; and Optelec Nederland B.V.*

cc: Counsel for Plaintiff and Defendant Bank of Ireland (via ECF)