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VIA ECF & EMAIL

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: Zync Music Group, LLC, et al. v. Round Hill Music Royalty Fund II, LP; 24-cv-3664-AT

Dear Judge Torres:

We are counsel for plaintiffs Zync Music Group, LLC and Zync Music, Inc. (“Plaintiffs” or “Zync”) in the above-referenced action. We write jointly with counsel for defendant Round Hill Music Royalty Fund II, LP (“Defendant”) pursuant to Section I.C of the Court’s Individual Practices in Civil Cases:

- (i) to confirm that Defendant does not object to Plaintiffs’ pending request for an extension of the time for Plaintiffs to file an amended complaint [Doc. 38], provided that the case schedule is correspondingly updated;
- (ii) to confirm that the Parties have agreed to adjust the interim discovery deadlines in Paragraph 6 of the current Civil Case Management Plan and Scheduling Order [Doc. 27] (the “Scheduling Order”); and
- (iii) to respectfully request an extension of certain discovery deadlines contained in Paragraphs 5 and 7 of the Scheduling Order.

With leave from the Court, Defendant filed a motion to dismiss Plaintiff’s complaint on August 12, 2024 [Doc. 32].¹ On August 22, 2024, in accordance with Section III.B(iv) of the Court’s Individual Practices in Civil Cases, Plaintiffs notified the Court of their intention to file an amended complaint and requested a two-week extension of time to file their amended pleading from September 3, 2024 to September 17, 2024 [Doc. 38]. Plaintiffs’ request was the first request for an extension of the time to file an amended pleading, and such request has not yet been granted or denied. Defendant does not object to that extension provided that the discovery dates are adjusted per this letter.

¹ Defendant had previously moved to compel appraisal and to stay the action pending that appraisal. That motion has been fully briefed and is pending before the Court. Defendant continues to reserve “its right to request an interim stay of discovery and/or the case” pending that motion, and the parties reserve all rights. [Doc. 35 at 1].

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Hon. Analisa Torres

August 28, 2024

Page 2

The parties have met and conferred about the case schedule, and in light of the need for additional time for the parties to serve and complete discovery given the anticipated filing of an amended complaint, the parties have agreed to change the “following interim deadlines,” pursuant to the Scheduling Order provision permitting the parties to adjust those deadlines “by the written consent of all parties without application to the Court. Scheduling Order ¶ 6.

Case Event	Current ¶ 6 Deadline	Newly Agreed ¶ 6 Deadline
Plaintiffs’ Filing of Amended Complaint	September 3, 2024	September 17, 2024
Service of Initial Requests for Production of Documents	August 23, 2024	October 17, 2024
Service of Interrogatories	August 23, 2024	October 17, 2024
Service of Requests to Admit	October 22, 2024	December 16, 2024
Completion of Depositions	November 21, 2024	January 15, 2025

Because these changes would extend discovery beyond the originally scheduled close of fact discovery and expert discovery in Paragraphs 5 and 7 of the Scheduling Order, the parties respectfully request that the Court extend those deadlines as set forth in the below table.

Case Event	Current ¶¶ 5, 7 Deadlines	Requested ¶¶ 5, 7 Deadlines
Completion of Fact Discovery	November 21, 2024	January 15, 2025
Completion of Expert Discovery	January 6, 2025	March 3, 2025

The parties therefore respectfully request that the Court grant the above changes to the dates in Paragraphs 5 and 7 of the Scheduling Order. Plaintiffs also respectfully reiterate their extension request in Doc. 38, to which Defendant does not object, subject to its reservation of rights in footnote 1 and provided that the scheduling changes sought herein are granted. With the exception of Plaintiffs’ previously-filed request for an extension of the time for Plaintiffs to file an amended complaint, this is the first request for an extension of these deadlines. We thank the Court for its consideration of the parties’ requests.

GRANTED. By **September 17, 2024**, Plaintiffs shall file their amended complaint. By **January 15, 2025**, all fact discovery shall be completed. By **March 3, 2025**, all expert discovery shall be completed.

SO ORDERED.

Dated: August 29, 2024
New York, New York



ANALISA TORRES
United States District Judge