

HILL RIVKINS LLP

45 Broadway, Suite 2110, New York, NY 10006-3776 Tel: 212 669-0600 Fax: 212 669-0698

> e-mail: thefirm@hillrivkins.com Website: www.hillrivkins.com

> > JUSTIN M. HEILIG Direct: (212) 669-0644 jheilig@hillrivkins.com

September 21, 2024

Via CM/ECF System

The Honorable John G. Koeltl United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, Courtroom 14A New York, NY 10007-1312

Tune to submit the Dule 26 [4) report extended to 10/18/24. Conf or 11/4/24 is cancelled. So ordered. 22. Gliselso 10.5.7.5.

Re:

Joint Request for Extension of Time to Submit Rule 26(f) Report Certain Interested Underwriters v. MSC Mediterranean Shipping Co. S.A.

SDNY Case No. 24-cv-5267 (JGK)

Dear Judge Koeltl:

We represent Plaintiffs in the above-referenced action. Pursuant to section I.E of Your Honor's individual rules, we write jointly with counsel for Defendant MSC to request a two-week extension of time to submit the parties' Rule 26(f) report. This is the first such request.

Under the Court's September 16, 2024 Order (ECF No. 9), the parties currently are required to submit their report by October 1, 2024. While counsel have discussed potential dates on which to meet and confer, the undersigned will be traveling abroad next week. Accordingly, the parties respectfully request a short extension and leave to file their Rule 26(f) report by October 15, 2024 so that counsel can confer on a mutually available date upon the undersigned's return. The parties do not seek an adjournment of the initial pretrial conference scheduled for November 4, 2024 and will be prepared to attend should the Court still wish to proceed on that date.

We thank the Court for its attention to the foregoing and stand ready to answer any questions that the Court may have with respect to the parties' extension request.

Respectfully submitted,

HILL RIVKINS LLP

Justin M. Heilig

NEW JERSEY The Bentley Building | 98 Craig Road Manalapan, NJ 07726 Tel: 732 838-0300 Fax: 732 316-2365

TEXAS 1000 N. Post Oak Rd., Suite 220 Houston, Texas 77055 Tel: 713 222-1515 Fax: 713 222-1359