

March 7, 2025

BY ECF

The Honorable Jennifer L. Rochon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: Doe v. Combs, et. al., Case No. 24-cv-07778 (JLR)

Dear Judge Rochon:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants").

The undersigned parties respectfully request that the Court's previously ordered deadline to submit a case management plan, currently scheduled for March 9, 2025, and initial pretrial conference, currently scheduled for March 19, 2025, be adjourned pending resolution of Defendants' motions to dismiss. *See ECF #29.*

All parties believe that it will be more efficient to defer discovery pending resolution of the motions to dismiss. If these motions are successful, they may result in complete dismissal of this action in its entirety or against certain defendants, which could significantly alter the scope of discovery that needs to be conducted.

Discovery in this matter is further complicated by the impending criminal trial of Defendant Sean Combs, which is scheduled to begin before Judge Subramanian on May 5, 2025. *See USA v. Combs*, Case No. 24-cr-00542 (S.D.N.Y.). The parties agree that it is impractical to proceed with various aspects of fact discovery involving Mr. Combs until this criminal trial is concluded. Deferring a case schedule pending the motions to dismiss will therefore have the added benefit of allowing time for the criminal matter to conclude.

Hon. Jennifer L. Rochon

March 7, 2025

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Respectfully submitted,

/s/ Mark Cuccaro

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The parties' joint request is GRANTED. The March 9, 2025 deadline for the parties to submit a case-management plan and the March 19, 2025 initial pretrial conference are hereby adjourned *sine die* pending resolution of the Defendants' motion to dismiss.

Dated: March 7, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge