

## COVINGTON

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By ECF

March 5, 2025

Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 18B  
New York, NY 10007

*Granted. The proposed judgment  
shall be filed by April 10, 2025.  
Denise Cote  
3/5/25*

**Re: *Novo Nordisk A/S et al. v. InVita Wellness, LLC*, Case No. 1:25-cv-00214-DLC**

Dear Judge Cote:

We are counsel of record to Plaintiffs Novo Nordisk A/S and Novo Nordisk Inc. in the above-referenced action, filed January 10, 2025.

We are pleased to inform the Court that Plaintiffs have reached a settlement agreement with Defendant InVita Wellness, LLC and that counsel for Defendant has appeared before the Court to join in submission of a proposed Final Judgment and Permanent Injunction on Consent.

On February 18, 2025, the Court ordered Plaintiffs to file a motion for default judgment by March 7, 2025 (this coming Friday). ECF Dkt. # 11.

Although Defendant's counsel had not yet entered an appearance before the Court, Plaintiffs have been in active settlement negotiations with Defendant, through counsel, since February 3, 2025.

To ensure compliance with the Court's Order, and with Defendant's knowledge, Plaintiffs requested and received a Clerk's Certificate of Default on February 21, 2025. ECF Dkt. ## 12–15.

In the meantime, settlement negotiations proceeded and have concluded with an agreement acceptable to all parties.

In light of the above, Plaintiffs respectfully request that the Court stay the following deadlines and proceedings before the Court for 30 days to permit the parties time to finalize the Settlement Agreement and the Court time to review the forthcoming proposed Final Judgment and Permanent Injunction on Consent:

1. March 7, 2025—Plaintiffs to move for default judgment;
2. March 13, 2025—Initial case management conference; and
3. March 21, 2025—Hearing on Plaintiffs' motion for default judgment.

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We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Neil K. Roman

Neil K. Roman

*Counsel to Plaintiffs Novo Nordisk  
A/S and Novo Nordisk Inc.*

cc (by ECF): Aaron M. Rubin, Esq.

*Counsel to Defendant  
InVita Wellness, LLC*