



MEMO ENDORSED

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September 4, 2020

VIA ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Monroe v. Gerbing*, 16-cv-2818 (KMK)

Dear Judge Karas:

This Office represents Defendants in the above-captioned case. I write on behalf of all parties to jointly request a settlement conference before a Magistrate Judge as soon as the Court is able, preferably within the next 4 weeks. The parties have been negotiating, and believe that a settlement conference could be beneficial and helpful in their attempt to settle this matter.

Separately, the parties request a stay of discovery pending the outcome of the settlement conference. If the case does not settle, the parties are prepared to meet the deadlines in the existing scheduling order within 6-11 weeks after the conclusion of the settlement reference, as stated below.

The parties note that there is a discrepancy in the deposition deadline. The June 3, 2020 docket entry notes that the deposition deadline is October 28, 2020, while the underlying document provides a different date—September 28, 2020—as the deadline. The parties request that, in the event the Court does not stay discovery pending the outcome of the settlement conference, the Court endorse the October 28, 2020 deadline for depositions.

Event	Current Deadline	Proposed Deadline
Deadline for the completion of depositions	September 28, 2020 / October 28, 2020	45 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful

Event	Current Deadline	Proposed Deadline
Deadline for the disclosure of Plaintiff's experts, including reports, production of underlying documents, and depositions	September 28, 2020	45 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful
Deadline for serving requests to admit	October 12, 2020	60 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful
Deadline for pre-motion letter(s)	October 29, 2020	70 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful
Deadline for the disclosure of Defendants' experts, including reports, production of underlying documents, and depositions	October 28, 2020	70 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful
Deadline for response to pre-motion letter(s)	November 5, 2020	80 Days after the Magistrate Judge reports that the parties' attempts to settle the case were unsuccessful

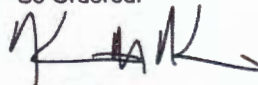
We thank the Court for its attention to this matter.

Respectfully submitted,
/s/ Amanda Yoon
 Amanda Yoon
 Assistant Attorney General
 Amanda.Yoon@ag.ny.gov

cc: Nimra Azmi, Esq.
 Victoria Whitney, Esq.
 Mary Bauer, Esq.
 Counsel for Plaintiff (via ECF)

Granted. The revised discovery schedule, including the stay, is approved.

So Ordered.



9/10/20