

JacksonLewis

Jackson Lewis P.C.

58 South Service Road, Suite 250
 Melville NY 11747
 (631) 247-0404 Main
 (631) 247-0417 Fax
jacksonlewis.com

Direct Dial: (631) 247-4652
 Email: JEFFREY.BRECHER@JACKSONLEWIS.COM

April 22, 2024

VIA ECF

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>05/06/2024</u>
--

Judge Román
 Federal Building and United States Courthouse
 300 Quarropas Street
 White Plains, NY 10601-4150

Re: *Raven Ramos, et al. v. Apple, Inc.*
Case No.: 22-cv-02761

Dear Judge Román:

We represent the Defendant, Apple Inc. Together with counsel for Plaintiffs, the parties write jointly to request: (1) an extension of the parties' motion to dismiss briefing schedule, and (2) a stay of discovery, for 45 days, so the parties can attend a mediation to potentially resolve this matter. The parties have agreed to a mediator and have scheduled a mediation for May 22, 2024. An extended briefing schedule and short stay of discovery will permit the parties to potentially avoid unnecessary litigation and associated costs. Accordingly, the parties respectfully suggest the below updated briefing schedule:

- Opposition to Motion to Dismiss: May 29, 2024 (currently May 1, 2024)
- Reply in Support of Motion to Dismiss: June 20, 2024 (currently May 16, 2024)

The parties further propose that on or before June 3, 2024 they will submit a revised discovery plan to Magistrate Judge McCarthy. We previously directed this request to Magistrate Judge McCarthy, but she advised the parties should direct this request to Your Honor.

Thank you for your attention to this matter.

Respectfully submitted,


s/ Jeffrey W. Brecher

JEFFREY W. BRECHER, ESQ.

The Court grants parties' requested extension to the motion to dismiss briefing schedule. Plaintiffs' opposition is now due May 29, 2024, and Defendant's reply papers are now due June 20, 2024. The parties are directed to seek a stay of discovery from Magistrate Judge McCarthy. The Clerk of Court is kindly directed to terminate the motion at ECF No. 75.

4865-2572-9976, v. 1

Dated: May 6, 2024
 White Plains, NY

SO ORDERED:

 NELSON S. ROMÁN
 United States District Judge