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June 5, 2024

VIA ECF & EMAIL: chambersnysdseibel@nysd.uscourts.gov

Honorable Cathy Seibel
United States District Judge
Southern District of New York
The Hon. Charles L. Briant Jr. Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: Hinerfeld v. Gina DeCrescenzo, P.C.
Case No. 23-cv-008810-CS
Our File No. 9020.0001

Dear Judge Seibel:

We represent Defendants in this Action. We write on behalf of all Parties to: (1) request that the case be referred to Magistrate Judge Krause for a settlement conference and (2) and a stay of the current discovery deadlines.

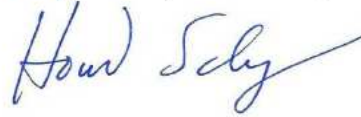
First, as discussed during the Preliminary Conference, the Parties had engaged in settlement negotiations prior to the filing of this lawsuit but believed that some discovery was necessary before resuming settlement talks. The Parties have exchanged discovery and are ready to proceed to a settlement conference. This is an appropriate juncture in the case to try and settle before the Parties begin costly depositions and additional electronic discovery.

Second, the Parties request a stay of the current discovery deadlines pending the settlement conference with the Court. The current deadline for completion of discovery is July 18, 2024. If settlement negotiations are unsuccessful then the discovery deadlines can be reset. This short stay will afford the Parties the opportunity to focus on settlement without the discovery deadline looming. We leave it to the Court's discretion whether to adjourn the July 30 status conference or keep it as a control date.

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Thank you for your consideration of this Request.

Respectfully submitted,



Howard Schragin

HS/aa

cc: Scott B. Goldshaw, Esq.
Christen L. Casale, Esq.
Counsel for Plaintiff

The Court will refer the case to Judge Krause for settlement. The current discovery deadlines are stayed pending the settlement conference. The parties shall provide a status update within 7 days of the settlement conference or by 7/23/24, whichever comes first.

6/05/24

SO ORDERED.


CATHY SEIBEL, U.S.D.J.