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White Plains, NY
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November 21, 2024

Via ECF

Hon. Kenneth M. Karas
The Hon. Charles L. Bricant Jr. Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Symphony Medical, P.C. v. Carelon Behavioral Health, Inc.*, No. 7:24-cv-05100
(KMK) (S.D.N.Y.)

Dear Judge Karas:

We represent plaintiff Symphony Medical, P.C. (“Plaintiff”) in the above-captioned action. We write with the consent of defendant Carelon Behavioral Health, Inc. (“Defendant”) to jointly request that the Court approve a stay of this litigation to allow the parties to continue settlement discussions.

Since the commencement of this litigation, the parties have worked cooperatively to identify the claims at issue and the reasons for denial of said claims. The claims analysis process is intensive and time-consuming, requiring the reconciling of over 10,000 individual claims. The parties have continued to engage in good faith efforts to resolve the dispute, but additional time is required to complete those efforts, including because the parties are also discussing the issues with a non-party to this litigation.

Accordingly, the parties respectfully request that the Court approve a stay of this litigation for three months, *i.e.*, through February 21, 2025, to allow the parties to continue their discussions. Consistent with the requested stay, the parties propose that Defendant’s time to respond to the Complaint be extended until seven days after the expiration of the stay.¹ The parties submit that the requested stay would conserve the resources of the parties and the Court and serve the interests of justice.

We thank the Court for its attention to this request.

Granted.

SO ORDERED.

11/22/2024

Respectfully submitted,

YANKWITT LLP

By:

Russell M. Yankwitt

Jonathan Ohring

cc: Valerie Sirota, Esq. (*via ECF*)

¹ With the consent of Plaintiff, Defendant previously requested extensions of time to respond to the Complaint, which were granted by the Court. This is the parties’ first request to stay the proceeding.