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February 9, 2023

VIA ECF

Honorable Gregory H. Woods, U.S.D.J.
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan U. S. Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: ***Haft, et al. v. Haier US Appliance Solutions, Inc. d/b/a GE Appliances, Case No. 1:21-cv-00506***

Dear Judge Woods:

In accordance with your Honor's Individual Rules 1(A) and (E), we write jointly on behalf of all parties in the above-referenced matter to respectfully advise the Court that the parties have reached a settlement in principle. The parties anticipate they will finalize a written agreement memorializing the terms in short order, and will be in a position to dismiss the action upon execution of the written agreement.

Accordingly, the parties respectfully request a short 30-day stay of the proceedings and all existing deadlines through March 13, 2023, to allow the parties to finalize the written settlement agreement and seek voluntary dismissal of the action.¹

The parties are available at the Court's convenience, should your Honor require additional information.

Dated: February 9, 2023

Respectfully submitted,

s/ M. Mona Simonian

M. Mona Simonian
PRYOR CASHMAN LLP

s/ Rachel Soffin

Rachel Soffin (admitted *pro hac vice*)
Jonathan B. Cohen (admitted *pro hac vice*)

¹ Existing deadlines include: (i) the deadline to complete depositions and the close of fact discovery currently scheduled for February 10, 2023, (ii) various deadlines for expert discovery through April through July 2023; (iii) the deadline for summary judgment motions currently scheduled for December 15, 2023; as well as (iv) other pretrial deadlines set forth on the Civil Case Management Plan and Scheduling Order dated October 13, 2022 (Dkt. 141).



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