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December 2, 2022

Via ECF Only

Honorable Judge Nina Gershon, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
(718) 613-2655

Re: *Judicial Watch v. Valentine, et al.*
Case No: 22-CV-3952 (NG) (CLP)

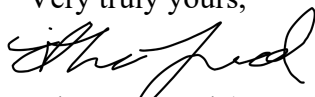
Dear Judge Gershon, U.S.D.J.:

Good afternoon. We are local counsel for the Plaintiff in the above referenced matter. We write today in conjunction with counsel for the Defendants. Specifically, we write to request a brief stay in this matter.

The parties have reached an agreed resolution of all claims in this matter. They need additional time, however, to conclude all paperwork related to that resolution. A number of deadlines are approaching, including the Defendants' time to answer or otherwise move (December 5, 2022) and other deadlines contained in the Court's Scheduling Order, Doc. No. 35. Accordingly, the plaintiff, with the consent of all parties, respectfully requests a 30-day stay of all pending deadlines to allow the parties to conclude their settlement. While there have been some extensions for Defendants' response, this relief has not been previously requested.

Thank you very much for your time, attention, and courtesies in this regard.

Very truly yours,



Ethan Leonard (EL2497)

Cc: All counsel (Via ECF)