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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.<sup>1</sup>

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*

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M. Mona Simonian  
PRYOR CASHMAN LLP

*s/ Rachel Soffin*

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

<sup>1</sup> 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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