

May 10, 2022

**VIA ECF**

Hon. Joseph C. Spero  
Chief Magistrate Judge  
U.S. District Court, Northern District of California  
San Francisco Courthouse, Courtroom G – 15th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Elise M. Bloom  
Member of the Firm  
d +1.212.969.3410  
f 212.969.2900  
ebloom@proskauer.com  
www.proskauer.com

Re: *Senne, et al. v. Office of the Commissioner of Baseball, et al.*  
No. 3:14-cv-00608-JCS

Dear Judge Spero:

We represent Defendants in the above-referenced matter and write jointly with Plaintiffs' counsel.

The parties are pleased to inform the Court that they have reached a settlement of the matter in principle. The parties have agreed upon a confidential memorandum of understanding. The settlement is subject to ratification by the respective parties, and we are in the process of preparing the settlement documents. In light of the parties' settlement in principle:

1. The parties respectfully request that the Court adjourn the initial pre-trial conference scheduled for May 10, 2022, the trial scheduled to begin on June 1, 2022, and all related trial proceedings and submissions.
2. Plaintiffs respectfully request until July 11, 2022 to file their motion for preliminary approval of the settlement.

We thank the Court for its consideration of the parties' request.



Hon. Joseph C. Spero  
May 10, 2022  
Page 2

Respectfully submitted,

*/s/ Elise M. Bloom*

---

Elise M. Bloom  
PROSKAUER ROSE LLP  
*Attorneys for Defendants*

*/s/ Clifford H. Pearson*

---

Clifford H. Pearson  
PEARSON, SIMON & WARSHAW LLP  
*Attorneys for Plaintiffs*

*/s/ Stephen M. Tillery*

---

Stephen M. Tillery  
KOREIN TILLERY, LLC  
*Attorneys for Plaintiffs*

cc: All Counsel (via ECF)