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April 14, 2020

**VIA ELECTRONIC COURT FILING**

Hon. Debra C. Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *VE, 1:19-cv-07625-AJN-DCF; Katlyn Doe, 1:19-cv-07771-PKC-DCF; Priscilla Doe, 1:19-cv-07772-ALC-DCF; Lisa Doe, 1:19-cv-07773-ER-DCF; Anastasia Doe, 1:19-cv-11869-MKV-DCF***

Dear Judge Freeman:

We represent Defendants in the above-referenced actions. In light of the ongoing pandemic and the various difficulties it has presented, we write with Plaintiffs' consent to request that the Court extend the remaining deadlines in the above-referenced actions, as set by this Court's Order dated February 11, 2020, by thirty (30) days, as follows:

- the deadline for Plaintiffs to file any motions to amend the pleadings or to join any additional parties be extended from April 30, 2020 to **June 1, 2020**;
- the deadline for the Parties to submit joint status reports to the Court, regarding discovery and the progress of settlement discussions, be extended from April 30, 2020 to **June 1, 2020**;
- the deadline for the completion of fact discovery be extended from June 10, 2020 to **July 10, 2020**;
- the deadline for service of Plaintiffs' expert reports be extended from June 10, 2020 to **July 10, 2020**;
- the deadline for service of the Defendants' rebuttal reports be extended from July 10, 2020 to **August 10, 2020**; and
- the deadline for the completion of expert discovery be extended from July 31, 2020 to **August 31, 2020**.

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This is the first request for an extension of these deadlines.

Respectfully submitted,

s/Bennet J. Moskowitz  
Bennet J. Moskowitz

cc: Counsel of Record (via ECF)