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MEMO ENDORSED

VIA ECF

1 Oct. 2018

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Williams v Epic Business Services* – Stay Pending Dismissal

Dear Judge Abrams-

We represent Defendant Epic Business Services Inc. (“EBS”) in the above referenced action. Pursuant to the Court’s Individual Practices, we write with the consent of Plaintiff’s counsel to request that all deadlines in this matter be stayed for 60 days, and that any conferences or hearings be continued accordingly. The parties have reached an agreement in principal to settle this matter and are currently negotiating the terms of a settlement agreement and dismissal.

Pursuant to the Court’s individual rules:

1. EBS’s response to the Amended Complaint is currently due on 1 Oct. 2018.

2. This is EBS's second request for an extension to respond to the *First Amended Complaint*.
3. One previous request was made to extend time to respond to the *First Amended Complaint*, which was granted on 31 August 2018.
4. Plaintiff's counsel consents to the extension.

The requested extension should not disrupt the schedule in the case, as the parties expect the case to be resolved by their settlement negotiations.

Accordingly, based on the foregoing, EBS respectfully requests that the Court stay all deadlines until 3 December 2018.

1 Oct. 2018

/Erik Dykema

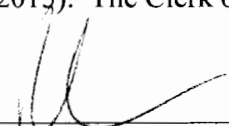
Erik Dykema

Date

*Counsel for Defendant Epic
Business Services Inc.*

The case is discontinued without costs to any party and without prejudice to restoring the action to this Court's docket if the application to restore the action is made within sixty (60) days. Any application to reopen this action must be filed within sixty (60) days of this order, and any application filed thereafter may be denied solely on that basis. If the parties seek to have the Court retain jurisdiction to enforce a settlement agreement, the terms of the agreement must be placed on the public record and "so ordered" by the Court within the same thirty-day period. *See Hendrickson v. United States*, 791 F.3d 354, 358 (2d Cir. 2015). The Clerk of Court is respectfully directed to close this case.

SO ORDERED.



Hon. Ronnie Abrams

10/02/2018

