

BURSOR & FISHER
P.A.

1330 AVENUE OF THE AMERICAS
32ND FLOOR
NEW YORK, NY 10019
www.bursor.com

MAX S. ROBERTS
Tel: 646.837.7408
Fax: 212.989.9163
mroberts@bursor.com

November 27, 2022

Via ECF

Honorable Steven I. Locke
Alfonse M. D'Amato Federal Building
United States District Court for the Eastern District of New York
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722

Re: *Natale v. 9199-4467 Quebec Inc. d/b/a Earth Rated, Case No. 2:21-cv-06775-JS-SIL*

We represent Plaintiffs Meganne Natale and Chelsea Cheng (“Plaintiffs”) in the in the above-referenced matter. On September 12, 2023, the Court stayed the case pending the Parties’ settlement discussion. The Parties have been engaging in such discussions during the intervening time but require additional time to complete negotiations. Plaintiffs respectfully request that the matter be stayed in its entirety for an additional sixty (60) days to allow the parties to continue to explore possible settlement. This request is submitted on consent of counsel for Defendant 9199-4467 Quebec Inc. d/b/a Earth Rated (“Defendant”). Counsel for Defendant is copied on this communication.

The parties therefore jointly request that the discovery conference, which is currently set for December 12, 2023, be vacated and taken off calendar in the interim.

Respectfully submitted,



Max S. Roberts

cc: All Counsel of Record (via ECF)