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February 6, 2026

Hon. Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007

MEMO ENDORSED

Re: *National Association of the Deaf et al. v. SiriusXM Holdings, Inc., et al.*,
Case No. 1:21-cv-10542-JAV

Dear Judge Vargas:

I write on behalf of counsel for both Parties in the above-captioned case to seek to extend the temporary stay in litigation deadlines to allow the Parties to continue to pursue resolution of the issues in this case without further litigation and the associated expenses.

On May 21, 2025, the Parties filed a request for a temporary stay in litigation deadlines until August 22, 2025, to pursue settlement negotiations. (ECF No. 114.) Your Honor granted that request on May 23, 2025 (ECF No. 115). The Parties have filed several joint requests to continue the stay of litigation deadlines, and following the Parties' most recent joint request (ECF No. 119), the Court extended the stay through February 13, 2026 while directing the Parties to submit a joint status letter by February 6, 2026. (ECF No. 122.)

The Parties attended a second mediation session before retired Magistrate Judge Steven M. Gold on January 26, 2026. The Parties now seek additional time to conduct settlement negotiations, including scheduling a further mediation session with Judge Gold for April 7, 2026. Accordingly, the Parties respectfully request that the temporary stay in all litigation deadlines be continued through April 21, 2026. The Parties intend to continue to discuss settlement without Judge Gold's assistance over the next several months, to ensure that a third mediation session will be productive.

The Parties further request that the Court require a joint status letter to be submitted by April 14, 2026, seven days prior to the proposed expiration of the stay. In this letter, the Parties will report on the status of settlement discussions and indicate whether: (1) a settlement has been reached; (2) a settlement has not yet been reached, but the Parties request an extension of the stay in litigation to engage in further

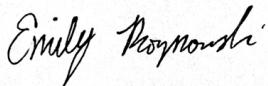
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settlement negotiations; or (3) the Parties intend to return to litigation and propose new deadlines for this matter, beginning with the close of expert discovery through the Parties' summary judgment briefing, and including a proposed timeline for the continued briefing of Defendants' Motion for Judgment on the Pleadings (ECF No. 112).

Notwithstanding the foregoing, should settlement negotiations not prove to be productive and the Parties determine a third mediation session with Judge Gold will not assist with resolving the issues without litigation, the Parties respectfully request that the Court permit either Party to seek to end the stay prior to April 14, 2026 and return to litigation, by submission of a letter with proposed new deadlines for this matter. Such letter will indicate whether the opposing party agrees to the proposed new deadlines, and if not, include any deadlines proposed by that party.

Respectfully Submitted,



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SO ORDERED:



The Honorable Jeannette A. Vargas
United States District Judge
February 9, 2026