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July 24, 2026

Via ECF

MEMO ENDORSED

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

Re: *National Association of the Deaf et al. v. Sirius XM 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 an extension of the temporary stay in litigation deadlines, which will allow the Parties to continue their efforts to resolve the issues in this case without further litigation and the associated expenses.

The litigation deadlines in this case have been stayed since May 23, 2025 to allow the Parties to pursue settlement negotiations. ECF No. 115 (granting request for temporary stay in litigation deadlines); *see also* ECF Nos. 117, 122 (granting requests to extend the temporary stay in litigation deadlines). Most recently, the Court extended the stay through July 31, 2026 and directed the Parties to submit a joint status letter by July 24, 2026. ECF No. 129.

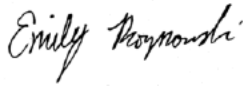
After three mediation sessions before Magistrate Judge Steven M. Gold (ret.), the Parties have reached an agreement in principle on all key terms, with a few outstanding items expected to be resolved in the coming weeks. The Parties respectfully request that the temporary stay in litigation deadlines be continued through October 30, 2026 to allow them to finalize their written agreement.

The Parties further request that the Court require a joint status letter to be submitted by October 23, 2026, seven days prior to the proposed expiration of the stay. In this letter, the Parties will report on the status of their written agreement and either (1) provide a timeline for filing the executed consent decree with the Court and dismissing Plaintiffs' claims; or (2) request an extension of the stay in litigation because the Parties need additional time to finalize their written agreement.

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Respectfully submitted,



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The Court is pleased to hear about the progress made with respect to settlement negotiations. Litigation deadlines will be stayed until October 30, 2026, to permit the parties to finalize their agreement in principle. In light of the settlement in principle, the Court deems the motion for judgment on the pleadings (ECF No. 112), as withdrawn as moot. The parties are cautioned, however, in light of the already lengthy stays that have been granted, the Court is unlikely to grant any further stay of this litigation. Accordingly, the parties should either be prepared to dismiss this case or to proceed with this litigation by that date.

On October 23, 2026, the parties shall submit a joint letter advising whether a settlement agreement has been finalized. If a settlement has not been finalized and a dismissal of this action is not forthcoming, the letter should set forth a proposal for next steps in this litigation, including a renewal of the motion for judgment on the pleadings and a revised case management plan.

The Clerk of Court is directed to terminate ECF Nos. 112 and 136.

SO ORDERED.

Date: July 29, 2026


JEANNETTE A. VARGAS
U.S. District Judge