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August 6, 2025

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. 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 engage in the currently scheduled mediation session 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, and directed the Parties to submit a joint status letter by August 15, 2025. (ECF No. 115.)

The Parties have scheduled a full day private mediation session before retired Magistrate Judge Steven M. Gold on September 25, 2025. Due to scheduling conflicts, the Parties could not arrange the mediation prior to the current expiration of the temporary stay in litigation deadlines. Accordingly, the Parties respectfully request that the temporary stay in all litigation deadlines be continued through October 10, 2025.

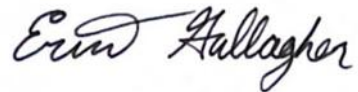
The Parties further request that the Court require a joint status letter to be submitted by October 3, 2025, seven days prior to the proposed expiration of the stay. In this letter, the Parties will report on the status of settlement discussions and indicate whether: (1) a settlement has been reached; (2) a settlement has not yet been reached, but the Parties request an extension of the stay in litigation to engage in further 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

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Parties' summary judgment briefing, and including a proposed timeline for the continued briefing of Defendants' Motion for Judgment on the Pleadings (ECF No. 112).

Respectfully Submitted,

A handwritten signature in black ink that reads "Erin Gallagher". The signature is written in a cursive, flowing style.

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