

JONES DAY

250 VESEY STREET • NEW YORK, NEW YORK 10281.1047

TELEPHONE: +1.212.326.3939 • JONESDAY.COM

DIRECT NUMBER: +1.212.326.3457

CZEPF@JONESDAY.COM

November 20, 2024

VIA CM/ECF

Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
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-JPO (S.D.N.Y.)

Your Honor:

Pursuant to Paragraph 3(C) of Your Honor’s Individual Rules and Practices, the parties write to request an extension of the schedule in the above-captioned case. This is the third request to extend the deadlines following the parties’ joint request for the limited reopening of fact discovery (*see* ECF No. 99). The Court has granted the parties’ prior requests for extension for fact discovery and summary judgment briefing (ECF Nos. 43, 49, 54, 58, 66, 74, 99).

The parties seek this extension to allow Plaintiffs to take discovery that will not become available until after the current close of fact discovery. The parties have agreed to reschedule the deposition of a Sirius XM witness. The parties propose the following extension from “Current” to “Proposed” which, if granted, would move the former schedule by approximately two months:

| Case Event | Current Deadline | Proposed Extension |
|--|------------------|--------------------|
| Close of fact discovery | 11/22/24 | 1/31/25 |
| Deadline to meet and confer regarding settlement following the closure of fact discovery | 12/6/24 | 2/14/25 |
| Expert Disclosures | 1/30/25 | 3/31/25 |
| Rebuttal Expert Disclosures | 3/7/25 | 5/7/25 |
| Close of Expert Discovery | 4/11/25 | 6/11/25 |
| Plaintiffs’ Summary Judgment Motion | 5/23/25 | 7/23/25 |
| Defendants’ Combined Summary Judgment Motion and Opposition | 7/2/25 | 9/2/25 |

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| Plaintiffs' Combined Opposition and Reply | 8/1/25 | 10/1/25 |
| Defendants' Reply | 8/15/25 | 10/15/25 |

We thank the Court for its attention to this matter.

Sincerely,

JONES DAY

/s/ Christopher Zepf
Christopher Zepf