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July 15, 2021

By ECF

Hon. Cathy L. Waldor
United States Magistrate Judge
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4040
Newark, New Jersey 07101

Re: Conforti v. St. Joseph's Healthcare Sys., Inc., No. 2:17-cv-00050-CCC-CLW (D.N.J.)

Dear Judge Waldor:

We write on behalf of Plaintiff Jionni Conforti in the above-captioned action to respectfully request a 30-day extension of the deadline for the parties to "file all papers necessary to dismiss this action under Federal Rule of Civil Procedure 41 or, if settlement cannot be consummated, request that the action be reopened." Dkt. 148. Defendants consent to this request.

Specifically, on April 19, 2021, the Court entered an Order Administratively Terminating the Action in 60 days on June 18, 2021, pending the consummation of a settlement. On June 14, 2021, the Court extended this deadline to July 19, 2021. While the parties have made significant progress and are optimistic about the prospect of finalizing a settlement, given the schedules of counsel and the need for counsel to go back to their clients to vet some outstanding items, the parties are unlikely to meet the July 19, 2021 deadline.

Accordingly, Plaintiff, with the consent of Defendants, respectfully requests a 30-day extension of the July 19, 2021 deadline for the parties to "file all papers necessary to dismiss this action under Federal Rule of Civil Procedure 41 or, if settlement cannot be consummated, request that the action be reopened." The parties are committed to consummating a settlement and this request is not made for the purpose of undue delay.

Respectfully submitted,

/s/ Jaclyn M. Palmerson
Jaclyn M. Palmerson

cc: Christopher M. Mayer, Esq. (counsel to Defendants)
Thomas A. Doherty, Esq. (counsel to Defendants)
Omar Gonzalez-Pagan, Esq. (counsel to Plaintiff)
Tom Barnes, Esq. (counsel to Plaintiff)

SO ORDERED

s/Claire C. Cecchi
Claire C. Cecchi, U.S.D.J.

Date: 7/22/2021

quinn emanuel urquhart & sullivan, llp

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