

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7104

WRITER'S EMAIL ADDRESS
jaclynpalmerson@quinnemanuel.com

August 20, 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 brief 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) to Friday, August 27, 2021. Defendants consent to this request.

The parties finalized their written agreement on August 18, 2021, but are still in the process of execution and require a short extension of time to complete the same. Accordingly, Plaintiff, with the consent of Defendants, respectfully requests until August 27, 2021, 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." *See also* Dkt. 150 (text order granting first request for extension); Dkt. 152 (text order granting second extension request). This brief extension will allow all necessary parties to execute the final agreement 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: 8/23/2021

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE | BOSTON
LONDON | TOKYO | MANNHEIM | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS | ZURICH | SHANGHAI | PERTH | STUTTGART