

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ENVY BRANDING, LLC,	:	
	:	Case No. 20-cv-3182 (PGG)
Plaintiff,	:	
	:	
- against -	:	
	:	
THE WILLIAM GERARD GROUP, LLC,	:	
WILLIAM G. DZOMBAK, CHELSEA	:	
C& A ENTERPRISES,	:	
	:	
Defendants.	:	
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**STIPULATION AND FOURTH REQUEST FOR ADJOURNMENT
OF CERTAIN DISCOVERY DEADLINES**

WHEREAS, fact discovery is presently scheduled to end on July 2, 2021 (ECF No. 23);

WHEREAS, the parties have worked cooperatively and diligently to advance discovery, including exchanging discovery demands and responses, supplemental document production, and serving subpoenas on third parties; and

WHEREAS, the parties will be unable to complete discovery by the present deadline due to circumstances beyond their control because, among other things, the parties are exploring potential resolution of the matter; the pandemic has continued to delay the parties' ability to compile necessary information and documents subpoenaed from third parties; the parties continue to work with certain third parties to complete their productions in response to certain subpoenas in an effort to avoid motion practice seeking to compel production or hold the subpoenaed parties in contempt; the parties have exchanged voluminous document production and additional productions are still being made, and the parties are working together in good faith to resolve discovery disputes and may ultimately have to seek the assistance of the Court as to those disputes, and are further scheduling and proceeding with certain depositions;

THEREFORE, the parties hereby stipulate to adjourn the fact discovery deadline from July 2, 2021 to September 30, 2021, and respectfully request that the Court grant the adjournment and So Order this Stipulation. This is the fourth request for an adjournment of discovery deadlines. Prior were predicated upon the medical condition of a party and other factors impacting discovery, and the parties have been diligent in their discovery efforts. Accordingly, the parties respectfully request that the deadlines within the Case Management Plan and Scheduling Order are adjourned as follows:

Discovery Event	Current Deadline	Proposed Deadline
Fact Discovery	July 2, 2021	September 30, 2021
Fact Witness Depositions	July 2, 2021	September 30, 2021
Expert Discovery	August 9, 2021	November 9, 2021
Expert Disclosures by Proponent	June 8, 2021	October 8, 2021
Expert Disclosures by Opponent	June 22, 2021	October 22, 2021
Post-discovery dispositive motion letter	July 12, 2021	December 10, 2021
Opposition to dispositive motion letter	July 19, 2021	December 17, 2021

Dated: June 24, 2021

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Attorneys for Plaintiff

Attorneys for Defendants

Dated: June 25, 2021

MEMO ENDORSED

So Ordered: 

Hon. Paul G. Gardephe

The Court approves the parties' stipulation except that the pre-motion letters for a dispositive motion are due on October 7, 2021. Any letter in opposition is due October 14, 2021.