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March 23, 2020

Via ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Arthur Bekker, et al. v. Neuberger Berman Group, LLC, et al.*
No. 16-cv-6123 (LTS) (BCM)

Dear Judge Swain:

The Parties write to inform the Court that they have made significant progress toward settlement of this matter and jointly request a stay of all deadlines, including Plaintiff's Response to Defendant's memorandum pursuant to the Court's show-cause order. Dkt. 126–127.

The Parties anticipate filing a motion for preliminary approval of a class settlement pursuant to Fed.R.Civ.P. 23 within 60 days of today. Accordingly, the Parties request an order staying all deadlines for a period of 60 days.

We thank the Court for its consideration.

Respectfully,

/s/ Gregory Y. Porter

/s/ Myron D. Rumeld

Gregory Y. Porter

Myron D. Rumeld

GYP/msc

cc: All counsel of record (via ECF)