

**PANISH
SHEA &
BOYLE**
LLP

August 21, 2020

VIA ECF

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Doe v. Indyke, et al.*, 1:20-cv-000484-JGK-DCF

Dear Judge Freeman:

We are writing on behalf of our client, plaintiff Jane Doe, in the above-referenced litigation. On August 19, 2020, defendant Ghislaine Maxwell made a motion to stay proceedings in this action. Pursuant to the Court's August 14, 2020 Scheduling Order, the parties have conferred regarding a schedule for opposition and reply submissions and hereby propose that oppositions shall be filed on or before August 27, 2020 and replies shall be filed on or before September 4, 2020. Additionally, the parties agree that the motion to stay does not affect any other deadlines set by the Court's August 14, 2020 Scheduling Order, without prejudice to the parties' respective rights and legal positions.

Respectfully submitted,

PANISH SHEA & BOYLE

/s/ Robert Glassman

Robert Glassman