

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 49M

VISION BIOBANC HOLDINGS, LLC,

Plaintiff,

v.

DEREK R. TALLER,

Defendant.

Index No. 651706/2024

Hon. Margaret A. Chan, J.S.C.

**JOINT STATUS REPORT**

Plaintiff Vision Biobanc Holdings, LLC (“Vision”) and Defendant Derek R. Taller (“Taller”), by their respective counsel, respectfully submit this Joint Status Report pursuant to the Court’s October 15, 2024 Order (NYSCEF Doc. No. 24; the “Order”) granting Vision’s Motion for Preliminary Injunction (Motion Seq. No. 002) and directing the parties to submit a proposed undertaking order pursuant to C.P.L.R. 6312(b).

1. Counsel for the parties have met and conferred but have been unable to reach an agreement on the appropriate amount of the undertaking.
2. The parties intend to submit a further Joint Status Report setting forth their respective positions regarding the appropriate amount of the undertaking no later than Monday, November 4, 2024.
3. The parties appreciate the Court’s consideration of this matter.

Dated: New York, New York  
October 31, 2024

**MORRIS KANDINOV LLP**

/s/ Andrew W. Robertson

Aaron T. Morris  
Andrew W. Robertson  
305 Broadway, 7th Floor  
New York, NY 10007  
(212) 431-7473  
aaron@moka.law  
andrew@moka.law

*Counsel for Plaintiff Vision  
BioBanc Holdings, LLC*

**WALTERS & WALTERS**

/s/ Matthew J. Walters

Matthew J. Walters  
20 Vesey Street, Suite 700  
New York, NY 10007  
(212) 227-1666  
mjw@walters-legal.com

*Counsel for Defendant Derek R. Taller*