



March 26, 2024

**VIA ECF**

Hon. Katharine H. Parker  
United States District Judge  
500 Pearl Street, Room 750  
New York, New York 10007

Re: Case No. 1:22-cv-09511

Hon. Judge Parker:

Request GRANTED. All deadlines are hereby stayed until **Friday, April 26, 2024**. The parties shall file a joint status letter with the court by **Friday, April 19, 2024** to provide an update on settlement negotiations and pursuit of default judgments.

**SO ORDERED:**

**HON. KATHARINE H. PARKER** 3/28/2024  
**UNITED STATES MAGISTRATE JUDGE**

We represent plaintiff, Phase One Network, Inc. (“Plaintiff”) in the above-referenced action. We are pleased to advise the Court that Plaintiff and Defendants Ye f/k/a Kanye West d/b/a “Yeezy Tech”, Getting Out Our Dreams II, LLC, G.O.O.D. Music and Yeezy LLC (collectively the “Ye Defendants”) have agreed to a settlement in principle and will begin the process of negotiating a settlement agreement. Plaintiff does not request a conditional 30-day order as Plaintiff intends to move for default against the non-settling defendants, Alex Klein, Kano Computing Limited and Stemplayer Ltd.(the “Stemplayer Defendants”), each of whom are in default as they did not file an Answer to Plaintiff’s original complaint. Although Plaintiff obtained a certification of default against the Stemplayer Defendants, a new certification of default will have to be obtained as Plaintiff recently filed its Amended Complaint. [Dkt No. 131].

Accordingly, we write pursuant to Rules I (b-c) of Your Honor’s Individual Practices in Civil Cases to respectfully request that the Court issue a 30-day stay of all Court deadlines under the Federal Rules and deadlines issued by this Court. Such a stay will relieve the Ye Defendants of their obligation to answer the Amended Complaint or otherwise move so that Plaintiff and the Ye Defendants can negotiate and finalize their settlement agreement. At the conclusion of this 30-day stay, Plaintiff will obtain a new certification of default against the Stemplayer Defendants and then move for default judgment. If settlement with the Ye Defendants is formalized, which we expect it to be, no further extension of the discovery and pre-trial deadlines will be necessary.

We appreciate the Court’s time and consideration.

Respectfully submitted,  
ADELMAN MATZ P.C.

David Marcus, Esq.

Cc: All counsel of record (via ECF)

ADELMAN MATZ P.C.