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January 2, 2025

Hon. John G. Koeltl  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

RE: Case No. 1:24-cv-05464-JGK; *Artist Publishing Group, LLC d/b/a APG, et al. v. Trail Blazers Inc. d/b/a Portland Trailblazers*; Joint Stipulation

Dear Judge Koeltl:

Pursuant to Civil Scheduling Order [Dkt. No. 26], counsel for Plaintiffs Artist Publishing Group, LLC; Kasz Money, Inc.; KMA Assets I LP; Kobalt Music Publishing America, Inc.; MXM Music AB; Notting Hill Music, Inc.; and Prescription Songs, LLC, and counsel for Defendant Trail Blazers Inc. hereby stipulate that additional time is needed to complete discovery in this case. Currently, the Civil Scheduling Order requires the parties to complete discovery by February 3, 2025, and to exchange expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) at least 30 days before. However, Plaintiffs' responses to Defendant's initial written discovery requests were not due until December 27, 2024, and Defendant recently propounded a second set of Requests for Production on Plaintiff, the responses to which are not due until February 3, 2025. Furthermore, there are significant third-party discovery disputes pending in a related case (Case No. 1:24-CV-05461-JSR) that are likely to affect discovery in this case. In addition, Plaintiffs have requested to consolidate this case with twelve other cases in *Artist Publishing Group dba APG, et al. v. Cavaliers Operating Company, LLC dba Cleveland Cavaliers*, Case No. 24-cv-05454-ER. See Dkt. No. 30. Plaintiffs' request remains pending.

While the parties have diligently pursued discovery in this case and will continue to do so, they require an additional 60 days to complete discovery. Accordingly, the parties propose extending the current discovery deadline from February 3, 2025 to April 4, 2025.

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Sincerely,

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/s/ Douglas Johnson

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