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January 31, 2024

Via ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Goidel et al. v. Aetna Life Insurance Co.*, No. 21-cv-7619

Your Honor:

Pursuant to the Court's order (Dkt. 80), we write on behalf of all parties with the status of settlement discussions. As detailed in our prior update, the parties have reached a settlement on all material terms. Plaintiffs provided Aetna with an initial draft of the settlement agreement, and to-date, the parties have exchanged edits to and comments on provisions of key sections of the draft settlement agreement. However, the parties require additional time to agree on a final draft of the agreement which will be submitted to the Court with a motion for preliminary approval. Accordingly, we jointly request an extension of the stay until February 29, 2024 to finalize the settlement agreement and motion for preliminary approval. To the extent that the parties are unable to agree on a final settlement agreement, the parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023.

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/

EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP

/s/

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