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Joe Mulherin  
Attorney at Law  
jmulherin@mwe.com  
+1 312 899 7159

April 17, 2024

VIA CM/ECF

The Honorable Jessica S. Allen  
United States District Court for the District of New Jersey  
Martin Luther King Building & United States Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

**Re: D'Ambly v. Exoo et al., Civil Case No. 2:20-cv-12880-JKS-JSA  
Update on Settlement Discussions**

Dear Judge Allen:

Defendants Tribune Publishing Company, LLC (“Tribune”) and the New York Daily News (the “Daily News”) (collectively, the “Defendants”) write jointly with Plaintiff Daniel D’Ambly to report on the status of the parties’ settlement discussions.

Pursuant to the Court’s instruction at the March 15, 2024 telephone hearing, the Parties have engaged in further settlement discussions. Counsel have conferred with their respective clients, and counsel spoke via telephone on March 25 and April 4, 2024. Unfortunately, the Parties have concluded that they are unable to reach a settlement at this time.

We appreciate the Court’s continued assistance in this case.

Respectfully submitted,

*s/ Lindsay Ditlow*

Lindsay Ditlow  
Joseph Mulherin (pro hac vice)  
Jean Edmonds (pro hac vice)  
McDermott Will & Emery LLP  
*Attorneys for Tribune Publishing Company  
and New York Daily News*

*s/ Patrick Trainor*

Patrick Trainor  
Law Office of Patrick Trainor  
*Attorney for Plaintiff Daniel D’Ambly*