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April 5, 2023

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Hachette Book Group, Inc., et al. v. Internet Archive, et al.*, 20-cv-04160-JGK

Dear Judge Koeltl:

The parties write jointly in response to the Court's March 24, 2023 order granting Plaintiffs' motion for summary judgment, denying Defendant's motion for summary judgment, and ordering the parties to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case no later than April 7, 2023.

The parties have engaged in multiple constructive conversations directed towards our shared goal of submitting a joint procedure to the Court but have not yet reached a resolution. In light of these continued discussions and given the religious holidays this week, the parties request a brief extension of the current deadline.

Accordingly, the parties respectfully request that the Court issue an order extending the deadline to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case by seven days, to **April 14, 2023**.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

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/s/ Elizabeth A. McNamara

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