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July 28, 2023

**VIA ECF**

The Honorable John G. Koeltl  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 14A  
New York, NY 10007-1312

Re: *Hachette Book Group, Inc., et al. v. Internet Archive*, Case No. 1:20-CV-04160-JGK

Your Honor:

The parties write jointly in connection with their July 28 deadline to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case.

The parties are very close to finalizing the terms of a consent judgment subject to a right of appeal, as well as other documents reflecting the parties' anticipated agreements. We hope to be able to submit the proposed consent judgment to the Court in the next week or so.

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 to **August 11, 2023**.

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

Respectfully submitted,

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cc: All Counsel (via ECF)