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May 22, 2024

VIA ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.*,
Case No.: 23-cv-11195-SHS

Dear Judge Stein:

I write on behalf of Plaintiff, The New York Times Company, to respectfully provide an update on the parties' disputes regarding the proposed Protective Order and Electronically Stored Information Order ("ESI Order"). *See* Dkts. 110, 113. Defendants join in this update.

The parties met and conferred and have significantly narrowed their disputes on the proposed Protective Order and ESI Order. The parties will file a letter motion with revised versions reflecting any remaining issues in dispute for the Court's consideration.

Respectfully submitted,

/s/ Ian B. Crosby

Ian B. Crosby

cc: All Counsel of Record (via ECF)