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December 30, 2021

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Juan B. Pujol Moreira, et al. v. Société Générale, S.A., et al., No. 20-cv-9380-JMF ("Pujol I")
Juan B. Pujol Moreira v. Société Générale, S.A., et al., No. 21-cv-2283-JMF ("Pujol II")

Dear Judge Furman:

This firm represents Defendant Société Générale in the above-captioned actions, and we are writing with the consent of all Parties. As required pursuant to the Defendants' March 22, 2021 letter to the Court in the above-captioned actions, so ordered by the Court on March 23, 2021, the Parties have met and conferred in good faith regarding the most sensible way to move forward in *Pujol II* in light of the Court's November 24, 2021 Opinion and Order granting Defendants' motion to dismiss in *Pujol I.*

The Parties have agreed, subject to approval of the Court, to the following:

1. If Plaintiffs decide to file a Second Amended Complaint in *Pujol I* in light of the Court's Opinion and Order in *Pujol I*, Plaintiffs at the same time, pursuant to Federal Rule of Civil Procedure 15(a)(1), will file an Amended Complaint in *Pujol II*, in which Plaintiffs shall make the same amendments. The current deadline for filing a Second Amended Complaint in *Pujol I* is January 18, 2022.

2. If and when the Amended Complaint is filed in *Pujol II*, the deadline for Defendants to answer or file a motion to dismiss the Amended Complaint in that case will be stayed through and including the date of a decision on the motion to dismiss the Second Amended Complaint in *Pujol I.*

3. Within 10 business days after a decision on the motion to dismiss in *Pujol I*, the Parties will meet and confer in good faith regarding the most sensible way to move forward in *Pujol II* in light of the Court's decision.

The Parties respectfully request that the Court grant the relief requested by this letter-motion.

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Respectfully submitted,

/s/ Steven Wolowitz

Counsel for Defendant Société Générale

cc: All Counsel of Record (by ECF)

Application GRANTED. The parties are reminded that all future filings in this case should be made only on the consolidated docket in Case No. 20-CV-9380. *See* 21-CV-2283, ECF No. 15. The Clerk of Court is directed to terminate ECF No. 63 in Case No. 20-CV-9380 and ECF No. 17 in Case No. 21-CV-2283 and docket this Order in Case Nos. 20-CV-9380 and 21-CV-2283. SO ORDERED.

January 3, 2022