



**Paul J. Lukas**  
Direct: (612) 256-3205  
Fax: (612) 338-4878  
lukas@nka.com

4700 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
(877) 448-0492

October 6, 2023

**VIA ECF**

The Honorable Jennifer H. Rearden, U.S.D.J.  
500 Pearl Street, Room 1010  
New York, New York 10007  
ReardenNYSDChambers@nysd.uscourts.gov

**RE: *Kohari, et al. v. MetLife Group, Inc., et al.*, Case No. 1:21-cv-06146-JHR  
Joint Status Letter and Letter Motion to Extend Deadlines**

Dear Judge Rearden:

We write to inform you the Parties have reached a settlement-in-principle of the above-captioned matter on a class action basis. Accordingly, the Parties respectfully request that Your Honor stay this action and all current deadlines.

Following a private mediation facilitated by Retired Judge James F. Holderman on August 31, 2023, where the parties were unable to reach a settlement, counsel for both sides continued to work toward a negotiated resolution. The Parties have reached a settlement-in-principle and expect to finalize a comprehensive settlement agreement and file a motion for preliminary approval by November 6, 2023.

Defendants have previously requested three extensions of time related to the pleading schedule, and the Parties have jointly requested three extensions of time related to the discovery schedule. The Court has granted all prior requests for extension.

The Parties request that the Court grant this joint letter motion and stay this action and all current deadlines as set forth in the Court's Order dated October 4, 2023. ECF No. 104.

Respectfully Submitted,

**NICHOLS KASTER, PLLP**

A handwritten signature in black ink, appearing to read 'PKL', written over a horizontal line.

Paul J. Lukas  
Attorney for Plaintiffs

**WILLKIE FARR & GALLAGHER LLP**

/s/ Craig C. Martin  
Craig C. Martin  
Attorney for Defendants

cc: All Counsel of Record (via ECF)