

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re WESTINGHOUSE ELECTRIC COMPANY LLC, <i>et al.</i> , Debtors.	Chapter 11 Case No. 17-10751 (MEW) (Jointly Administered)
WESTINGHOUSE ELECTRIC COMPANY LLC, <i>as reorganized</i> Plaintiff, v. SOUTH CAROLINA PUBLIC SERVICE AUTHORITY Defendant	Adv. Proc. No. 19-01109 (CGM)

JOINT MOTION TO AMEND THE DISCOVERY DEADLINE

Plaintiff Westinghouse Electric Company LLC (“WEC”) and Defendant South Carolina Public Service Authority (“Santee Cooper,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, respectfully submit this Joint Motion to Amend the Discovery Deadline (the “Motion”). In support thereof, the Parties inform the Court as follows:

1. On December 13, 2019, the Parties engaged in all-day mediation in New York before mediator Noah Hanft. Thereafter, the Parties continued to discuss a potential framework for the resolution of the issues in this action.



2. On January 29, 2020, the Parties engaged in another full-day mediation in South Carolina before mediator Hanft.

3. The Parties are still in the process of mediation and are attempting to agree to final settlement terms.

4. Pursuant to the Parties' jointly submitted Stipulation and Amended Scheduling Order, entered by the Court on November 20, 2019 (ECF No. 64), the Parties are to complete document production by February 12, 2020 and exchange privilege logs on February 21, 2020.

5. The Parties have focused their time, resources, and efforts on the above-described mediation and settlement discussions in an attempt to resolve this dispute.

[Remainder of the Page Intentionally Left Blank]

6. Accordingly, the Parties respectfully request that the Court extend the near-term February 12, 2020 deadline for the completion of document production and the February 21, 2020 deadline for the exchange of privilege logs by seven (7) days, to allow the Parties to continue their settlement discussions with mediator Hanft.

Respectfully submitted,

Dated: February 12, 2020
New York, NY

WEIL, GOTSHAL & MANGES LLP

By: s/ Robert S. Berezin

Robert S. Berezin

Edward Soto

767 Fifth Avenue

New York, NY 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Gary.holtzer@weil.com

Edward.soto@weil.com

Robert.berezin@weil.com

David.griffiths@weil.com

Counsel for Plaintiff

DEBEVOISE & PLIMPTON LLP

By: s/ Shannon Selden

Shannon Rose Selden

David Sarratt

Jared I. Kagan

Zachary H. Saltzman

919 Third Avenue

New York, NY 10022

Telephone: (212) 909-6000

Facsimile: (212) 909-6836

srselden@debevoise.com

dsarratt@debevoise.com

jikagan@debevoise.com

saltzmzh@debevoise.com

Counsel for Defendant

Dated: February 13, 2020
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge