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February 18, 2020

BY EMAIL AND ECF

The Honorable Cecelia G. Morris, Chief Judge
United States Bankruptcy Court, Southern District of New York
One Bowling Green
Chambers 627
New York, NY 10007
Poughkeepsie.orders@nysb.uscourts.gov

**In re: Westinghouse Electric Company LLC v. South Carolina Public Service Authority,
Adv. Pro. No. 19-01109 (CGM)**

Dear Chief Judge Morris:

We represent Defendant, the South Carolina Public Service Authority (“Santee Cooper”) in the above-referenced adversary proceeding. Pursuant to Your Honor’s Chambers’ Rules and the Local Bankruptcy Rules for the Southern District of New York, we write jointly along with Plaintiff, Westinghouse Electric Company LLC, to request an adjournment of the status conference scheduled for Thursday, February 20, 2020, at 2:00 p.m., until March 12, 2020. We have also attached to this letter a Notice and Stipulation of Adjournment for your approval.

As stated in the parties’ Joint Notice of Mediation (ECF No. 68) and the parties’ Joint Motion to Amend the Discovery Deadline (ECF No. 74), the parties mediated this dispute on December 13, 2019 and engaged in a second full-day mediation on January 29, 2020. Mediation discussions remain ongoing and, as a result, the parties respectfully request that this week’s status conference be adjourned until March 12, 2020 or another time convenient for the Court, at which time both parties will be in a better position to update the Court on the outcome of mediation.



The Honorable Cecelia G. Morris, C.J.

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February 18, 2020

Respectfully yours,

/s/ Shannon Rose Selden

Shannon Rose Selden

David Sarratt

Jared Kagan

Zachary Saltzman

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*Counsel to South Carolina Public
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cc (by ECF):

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Reed Smith LLP, *Counsel to South Carolina Public Service
Authority*

Gallivan, White & Boyd PA, *Counsel to South Carolina
Public Service Authority*

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

In re

WESTINGHOUSE ELECTRIC COMPANY LLC,
et al.,
Debtors.

Chapter 11
Case No. 17-10751 (MEW)
(Jointly Administered)

WESTINGHOUSE ELECTRIC COMPANY LLC, *as
reorganized*

Plaintiff,

Adv. Proc. No. 19-01109 (CGM)

v.

SOUTH CAROLINA PUBLIC SERVICE
AUTHORITY

Defendant.

**NOTICE AND STIPULATION OF ADJOURNMENT OF THE FEBRUARY 20, 2020 STATUS
CONFERENCE**

THIS NOTICE AND STIPULATION (the “Stipulation”) is made by and through the undersigned counsel for Plaintiff and Defendant (the “Parties”), in accordance with Chief Judge Morris’ Individual Rules of Practice.

WHEREAS, Chief Judge Morris directed the Parties to consider mediation and return for a status conference on December 5, 2019, concerning the same (*see* ECF No. 56);

WHEREAS, the December 5, 2019 status conference was adjourned in light of the Parties’ scheduled mediation;

WHEREAS, the Parties submitted a Joint Notice of Mediation advising the Court that the Parties “participated in a full-day mediation on Friday December 13, 2019 and have not come to a resolution” (*see* ECF No. 68);

WHEREAS, the Parties engaged in a second full-day mediation on January 29, 2020, before mediator Hanft;

WHEREAS, the Parties are still in the process of mediation and are attempting to agree to final settlement terms; and

WHEREAS, the Parties have agreed to adjourn the status conference scheduled for February 20, 2020, to allow for continued negotiation discussions.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and through the undersigned counsel for the Parties, as follows:

1. The status conference in the above-captioned action, originally scheduled for Thursday, February 20, 2020 at 2:00 p.m., shall be adjourned to March 12, 2020 or another time convenient for the Court.
2. This Stipulation may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together will constitute one and the same instrument. A facsimile or other electronic transmission of a duly executed counterpart of this Stipulation shall be as valid, in all respects, as the original.

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Dated: New York, New York
February 18, 2020

DEBEVOISE & PLIMPTON LLP

WEIL, GOTSHAL & MANGES LLP

/s/ Shannon Rose Selden

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*Attorneys for Plaintiff Reorganized
Westinghouse Electric Company LLC*