

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

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| In re<br>WESTINGHOUSE ELECTRIC COMPANY LLC,<br><i>et al.</i> ,<br><br>Debtors.   | Chapter 11<br>Case No. 17-10751 (MEW)<br>(Jointly Administered) |
| WESTINGHOUSE ELECTRIC COMPANY LLC,<br><i>as reorganized</i><br><br>Plaintiff,<br><br>v.<br><br>SOUTH CAROLINA PUBLIC SERVICE<br>AUTHORITY<br><br>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 were to complete document production by February 12, 2020 and exchange privilege logs on February 21, 2020.

5. The Parties jointly submitted three Motions to Amend the Discovery Deadline (ECF Nos. 74, 76, & 79), requesting that the February 12, 2020 to March 11, 2020 for the completion of document production, and from February 21, 2020 to March 20, 2020 to exchange privilege logs. An order granting the first motion was entered by the Court (ECF No. 74) on February 13, 2020. The second and third motions remain pending at this time.

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

7. Accordingly, the Parties respectfully request that the Court extend the near-term March 11, 2020 deadline for the completion of document production and the March 20, 2020 deadline for the exchange of privilege logs by fourteen (14) days, to March 25, 2020 and April 3, 2020, respectively, to allow the Parties to continue their settlement discussions with mediator Hanft.

Respectfully submitted,

Dated: March 11, 2020  
New York, NY

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