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April 1, 2024

VIA CM/ECF

The Honorable Christopher J. Burke
J. Caleb Boggs Federal Building
844 N. King Street
Unit 28, Room 2325
Wilmington, DE 19801-3555

Re: *Midwest Energy Emissions Corp., et. al v. Arthur J. Gallagher & Co.,
et al.*, C.A. No. 19-1334-CJB

Dear Judge Burke,

Pursuant to the Court's March 8, 2024 oral order, post-trial motions are due on April 5, 2024. The parties have conferred regarding the appropriate timing of ME2C's post-trial motions given the upcoming bench trial on Defendants' equitable defenses. The parties agree that the issues in those motions may be most efficiently presented after that bench trial is completed. This would not affect the deadline for Defendants' post-trial motions.

Accordingly, Plaintiffs request that the Court order that ME2C's post-trial motions (i.e., motions for willfulness enhancement, attorneys' fees, and/or interest) may be filed after the bench trial on Defendants' equitable defenses. Defendants do not oppose this request.

Respectfully,

James M. Lennon

James M. Lennon (No. 4570)

JML/dla

cc: Clerk of the Court (via CM/ECF)
Counsel of Record (via CM/ECF)