

EXHIBIT 1

From: Daniel Herrera <dherrera@kttlaw.com>
Sent: Sunday, August 25, 2024 11:47 AM
To: Levy, Joshua S.; Palmeri, Vincent; Cheney, Alexander; Lombardi, Stuart; Morris, Daniel L.; Hanley, Katherine; Morton, Adriana
Cc: Jorge L. Piedra; Dwayne Robinson; Michael Lorigas; Simon S. Grille
Subject: Benworth Capital Partners LLC v. Oto Analytics, LLC Meet and Confer

*** EXTERNAL EMAIL ***

Counsel,

We would like to have a meet and confer on Monday via zoom to discuss the following items:

- 1. Response to Womply's Motion to Confirm.** Instead of doing briefing separately on Womply's petition to confirm and Benworth's petition to vacate, we propose doing it all together. In other words, Benworth's response to Womply's motion would also be a cross-petition to vacate. Under our proposal, Womply would respond in opposition to that (instead of the petition filed in the related action), and then Benworth will file a reply that solely addresses our cross-petition components. Are you agreeable to this?
- 2. Extension of Time and Enlargement of Page Limits.** Benworth intends to move the Court for an expansion of the page limits for its response/cross petition. Along with the request for additional pages, we intend to ask the Court to extend our deadline to oppose Womply's motion to confirm until 10 days after it rules on the request for additional pages. Would Womply be willing to stipulate to this, and a limit of 60 pages?
- 3. Sealing Documents.** As a follow-up to our conversation last week, we would like to discuss our competing motions to seal.
- 4. Consolidation.** Benworth agrees to consolidate the two actions.

Please let me know you availability.

Best,

DANIEL HERRERA, ESQ.



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