

LAW OFFICE OF AMY JANE AGNEW

Honorable Loretta A. Preska
Senior Justice, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

March 4, 2024

VIA ECF

**Re: Bariquete v. Martuscello, et al., 79-cv-5077
Extension of Time for Fees and Costs Application**

Dear Judge Preska:

Class Counsel writes to respectfully request the Court grant Plaintiffs' counsel an extension for submission of its deadline to file its fees and costs application until Monday, March 18, 2024. Defendants' counsel has graciously offered to revisit a settlement of the fees and costs application with reference to our final underlying time keeping submissions. We will have those finalized tomorrow and get them to Defendants' counsel. If the parties cannot come to a preliminary agreement by Monday, March 18, 2024, Plaintiff's counsel will file its application. We are hopeful the parties can avoid motion practice all together.

With our thanks for the Court's continuing courtesies.

Very truly yours,

/s/ AJ Agnew

Amy Jane Agnew, Esq.

Plaintiffs' counsel shall file an application for fees and costs no later than March 18, 2024.

SO ORDERED.

cc: Counsel of Record (VIA ECF)

Dated: March 4, 2024



LORETTA A. PRESKA, U.S.D.J.