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Capitol Records, LLC v. ReDigi, Inc.
June 28, 2016

Doc. 235

VIA ECF AND ELECTRONIC MAIL

Hon. Richard J. Sullivan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *Capitol Records LLC v. ReDigi Inc., et al.* (12 Civ. 00095) (RJS)

Hon. Judge Sullivan:

As you are aware, my firm Adelman Matz P.C., is currently counsel of record for Defendant ReDigi Inc. ("ReDigi") in the above-referenced action. Although our firm has been discharged without cause, as our motion to withdraw as counsel, which was filed yesterday June 27, 2016, is currently still pending before the Court, we have agreed to submit the instant request for ReDigi.

Pursuant to 1.D of Your Honor's Individual Practices, ReDigi is respectfully requesting an extension of its deadline to respond to Plaintiffs' June 23, 2016 pre-motion conference letter in anticipation of filing a motion to register the final judgment in other districts [DE 231]. Pursuant to 2.A of Your Honor's Individual Practices, the deadline to respond to the Plaintiffs' June 23, 2016 letter is today. ReDigi is respectfully requesting that its deadline to respond to Plaintiffs' pre-motion conference letter be extended ten (10) days i.e. up to and including July 8, 2016.

The reason for the request is that ReDigi seeks to consult other counsel to determine how best to respond to Capitol's pending request.

There have been no previous requests to extend the deadline to respond to Plaintiffs' June 23, 2016 pre-motion conference letter. This request does not impact any other deadlines in this case.

We have conferred with counsel for Plaintiffs concerning this request and they have advised that Plaintiffs do not consent to this request for an extension. Plaintiffs' counsel has stated

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that their reason for refusal is that their client is concerned about the impact of further delays on its ability to enforce the judgment given the apparent financial condition of ReDigi.

We apologize to the Court in advance for making this request today, rather than forty eight hours (48) in advance. To preserve the confidentiality of our communications with ReDigi's new counsel we cannot explain at length the reasons for not making this request further in advance.

We greatly appreciate Your Honor's time and consideration in this matter, and should the Court need any further information we are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz, Esq.

Cc: *Via ECF and Simultaneous E-Mail*
Counsel of Record

Via Simultaneous E-mail
ReDigi Inc. (John Ossenmacher john@ReDigi.com; Larry Rudolph larry@redigi.com)