

**HELEN F. DALTON & ASSOCIATES, P.C.**  
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October 25, 2022

**Via ECF:**

The Honorable Vernon S. Broderick United  
States District Court  
Southern District of New York  
Thurgood Marshall United States  
Courthouse 40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 10/27/2022

Re: **Miranda, et al. v. Grace Farms, Inc. d/b/a City Café, et al.**  
**Civil Docket No.: 16-cv-1369 (VSB)**

Dear Judge Broderick:

Our office represents the *Miranda* Plaintiffs in this FLSA action, and we respectfully submit this letter motion to respectfully request a two-week extension of time for the parties to file their Motion for settlement approval and related settlement documents for Court review (the “Motion”).

As a preliminary matter, we apologize to the Court for our violation of prior Courts Order, and not sooner notifying the Court that the parties would be unable to satisfy the prior October deadlines. Dkt. Nos. 115-116. This result was due to our office’s closure on various days earlier this month due to our office’s observance of religious holidays as well as our office’s temporary loss of contact with our clients and our inability to reach them earlier in the month. This resulted in the delay in preparing the settlement documents to send to defense counsel and our office overlooking the deadline for filing.

Since then, however, we have drafted the settlement documents, which we are sending to defense counsel for his review. Our office anticipates that we will be able to finalize the documents within the next two weeks.

We attempted to contact Defendants’ counsel today prior to the filing of this motion, but were unable to reach him; however, we have no reason to believe that Defendants’ counsel would not join in this request, and would consent to the relief sought herein.

Accordingly, we respectfully request a two (2) week extension of time to submit the parties’ motion for settlement approval and settlement documents. If this request is granted, the parties will be able to do so, and have the documents submitted for the Court’s review by or before November 8, 2022.

We thank Your Honor for his kind consideration in this matter, and we remain available to provide any additional information.

Respectfully submitted,

*Roman Avshalumov*  
Roman Avshalumov, Esq.

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*ATTORNEY TO BE NOTICED FOR THE DEFENDANTS*