

LAW OFFICE OF  
**JUSTIN A. ZELLER, P.C.**JUSTIN A. ZELLER  
JAZELLER@ZELLERLEGAL.COMJOHN M. GURRIERI  
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August 5, 2020

**VIA ECF**Hon. Gabriel W. Gorenstein, United States Magistrate Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States CourthouseRe: *Fernandez et al v. HR Parking Inc et al*, 16 CV 2762 (GWG)

Dear Judge Gorenstein:

This firm represents the plaintiffs in the above-referenced action. The pretrial materials required by docket number 108 are currently due on August 14, 2020. The parties move to extend this deadline until November 13, 2020. This request for an extension is the parties' fifth, and the prior requests were granted. All parties consent to this letter.

HR Parking Inc. and Nelson Rodriguez are represented in this action by the Law Offices of Michael K. Chong. The attorney who was handling the case for Mr. Chong's office, Yolanda Rivero, tragically died due to Covid-19, and Mr. Chong's firm has been working to catch up on this case and the other cases that Ms. Rivero was handling. In late July 2020, Mr. Chong's father tragically and unexpectedly passed away, and he has been out of town in Maryland handling family obligations related to his death. Therefore, Mr. Chong has been unable to finalize edits to the pretrial materials and additional time is required for him to do so. The parties will also use this additional time to continue to endeavor to settle during this time. The parties further understand that due to the Pandemic, civil trials will be delayed.

We thank the Court for its time and consideration.

Respectfully submitted,



John M. Gurrieri

**Extension to Nov. 13, 2020, granted.  
So Ordered.**GABRIEL W. GORENSTEIN  
United States Magistrate Judge

August 6, 2020