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SO ORDERED. Dated: April 7, 2020 New York, NY

Loutta a. Preska

April 6, 2020

VIA ECF

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

Hon. Loretta A. Preska United States District Judge United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

## Re: Range, Jr. v. 230 West 41st Street LLC et al., Civil Action No.: 1:17-cv-00149-LAP

Dear Judge Preska:

This firm represents Defendant 230 West 41st Street LLC ("230 West") in the above referenced matter. We write, jointly with Defendant Hat Trick Pizza, Inc. (collectively with 230 West, "Defendants"), and with the consent of Plaintiff King Range, Jr. ("Plaintiff"), Domino's Pizza LLC, and Domino's Pizza Franchising LLC, to respectfully request a one week extension of Defendants' deadline to submit their reply papers in support of summary judgment, from April 9, 2020 to April 16, 2020.

By way of background, Defendants filed their motion for summary judgment on February 7, 2020. (ECF Nos. 80-89.) On March 5, 2020, Plaintiff requested an additional week to file his opposition papers, which the Court granted. (ECF Nos. 93, 95.) Plaintiff filed his opposition papers on March 12, 2020. (ECF Nos. 96-99.)

Defendants' reply is presently due on April 9, 2020. Defendants respectfully request the additional time in order to complete briefing on this motion, given the substantial business disruption and related challenges presented by the current public health emergency. Defendants are endeavoring to complete the briefing on the motion as soon as practicable, and this application is accordingly not intended to cause undue delay.

The undersigned has communicated with counsel for Plaintiff, Domino's Pizza LLC and Domino's Pizza Franchising LLC, and these parties consent to this request. This is Defendants' first request for an extension of this deadline (although the deadline was previously adjusted based on Plaintiff's previous application for an extension of briefing), which, if granted, will not impact any other deadlines. We thank the Court for its time and attention to this matter, and for its consideration of this application. Doc. 101

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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)