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February 28, 2022

VIA ECFHon. 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 Plaintiff King Range, Jr. (“Plaintiff”) and Defendant Hat Trick Pizza, Inc. (“Hat Trick”) (collectively, the “Parties”) to respectfully request a 30-day extension of the February 28, 2022 deadline to re-open the above-referenced matter, up to and including March 30, 2022. This is the second application for an extension of this deadline.

By way of background, Plaintiff corresponded with the Court by letter dated November 24, 2021 to advise that the Parties had reached an agreement in principle to settle this action following a mediation on November 22, 2021, and to request 60 days to consummate the settlement (ECF. No. 129), which the Court granted on November 29, 2021 (ECF No. 130). Plaintiff corresponded again with the Court, with consent of the 230 West and Hat Trick, to request an additional 30-day extension of this deadline on January 26, 2022 (ECF No. 133), which the Court granted on January 27, 2022 (ECF No. 134).

Since the Parties last reported to the Court, they have exchanged a number of proposals on one remaining substantive issue required to finalize the settlement agreement. They have been negotiating in good faith and not to cause undue delay. The Parties respectfully request this second extension to allow them to hopefully finalize the terms of the settlement so that a restoration of this action on the Court’s calendar will be unnecessary.

We thank the Court for its time and attention to this matter, and for its consideration of this joint application.

SO ORDERED.Dated: February 28, 2022
New York, New York
LORETTA A. PRESKA
Senior United States District Judge



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)