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March 31, 2020

VIA ECF

Honorable Magistrate Judge Barbara Moses United States District Court Southern District of New York 500 Pearl St. New York, NY 10007



Barbara Moses, U.S.M.J. March 31, 2020

Re: Julian et al. v. Metropolitan Life Insurance Co., No. 17-cv-00957 (AJN)(BCM)

Your Honor:

We represent Defendant Metropolitan Life Insurance Co. ("Defendant") in the above-referenced action. Pursuant to Rules 1(b) and 2(a) of Your Honor's Individual Practices, Defendant writes this letter-motion to respectfully request a two-week extension of time to answer, move, or otherwise respond to Plaintiffs' Third Amended Complaint. Defendant seeks this extension because defense counsel have been inundated with COVID-19 related issues over the past few weeks and require additional time to provide a fulsome response to Plaintiffs' new allegations in the Third Amended Complaint. Defendant's responsive pleading is currently due on April 3, 2020 per the parties' stipulation (ECF 118), and Defendant respectfully requests that the Court extend its time to respond to April 17, 2020. This is Defendant's first request for an extension of time to the stipulated April 3, 2020 deadline to respond to the Third Amended Complaint. Counsel for Plaintiffs consents to this request. If granted, this request for an extension of time will not affect any other scheduled dates in this matter.

Thank You for your consideration.

Sincerely,

/s/ Melissa C. Rodriguez

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