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October 22, 2021

By ECF

Hon. Vernon Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. October 25, 2021

Re: Ricardo Castro and Jeff Jackson v. AABC Construction, Inc. et ano.  
17 Civ. 1205 (VSB) (KNF)

Dear Judge Broderick:

This firm represents Plaintiffs Ricardo Castro and Jeff Jackson in the above-captioned matter. I write, with the consent of counsel for defendant Daniel Sheeri, to request a brief additional extension of the parties' time to file pretrial submissions.

Counsel continues to work collaboratively to prepare the required joint pre-trial order, but will require additional time to resolve the last outstanding issues and to finalize the filing for submission to the Court.

Accordingly, I respectfully request:

(1) That the deadline for submission of a joint pre-trial order and of motions *in limine*, currently set for October 22, 2021, be extended through and including November 5, 2021; and

(2) That the deadline for submission of oppositions to motions *in limine*, proposed voir dire questions, proposed verdict sheets, and proposed jury instructions be extended from November 5, 2021 through and including November 19, 2021.


Although the Court has previously granted several such extensions, it is respectfully submitted that, because this matter is not currently scheduled for trial, no prejudice will result from this additional adjournment.

Hon. Vernon Broderick  
October 22, 2021  
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Thank you for your consideration of this letter.

Very truly yours,

MOSKOWITZ & BOOK, LLP

By:   
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Christopher R. Neff

cc: All counsel of record, via ECF