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THE LAW FIRM OF HUGH H. MO, P.C.

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MEMO ENDORSED

January 21, 2022

VIA ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Wei Su and Hai Juan Wang v. Sotheby's Inc.*
Civil Action No. 17-cv-4577 (VEC)

Dear Judge Caproni:

We are the attorneys for Yeh Yao Hwang ("Yeh") in the above-referenced matter.

Pursuant to the Court Order dated January 4, 2022, a pre-trial conference is currently scheduled for April 28, 2022 and trial on May 9, 2022, with both proceedings in-person.

Pursuant to the Court's Individual Practice Rules, on January 18, 2022, we attempted to meet and confer with opposing counsel regarding our request for an adjournment of the pre-trial conference and the trial dates due to the personal conflict of the lead counsel, Elizabeth L. Mo, Esq., being absent from New York, and requested their consent. In the absence of a response, we followed up with counsel yesterday and today, and advised that if we do not hear from counsel, we will make our request to the Court without their input. See attached emails dated January 18, 20, and 21, 2022.

We hereby request an adjournment of the pre-trial conference to the weeks of April 18 or May 18, 2022, and the trial to the weeks of May 23, or May 30, or June 6, 2022. We have conferred with Mr. Yeh and he has no objection to the adjourned dates, and will be making arrangements for his travel to the United States from Taiwan prior to the scheduled trial date.

We thank the Court for its kind consideration.

Respectfully submitted,


Hugh H. Mo

cc: Leo Clarke, Esq.
Xue Jie Wong, Esq.



Hugh H. Mo <hhmo@hbmolaw.com>

Re: Su v. Sothebys - Adjourning final pre-trial conference and trial dates

1 message

Hugh H. Mo <hhmo@hbmolaw.com>

Fri, Jan 21, 2022 at 3:45 PM

To: "leolclarke@yahoo.com" <leolclarke@yahoo.com>

Cc: Jie Wong <xwonglaw@gmail.com>, "elmo@hbmolaw.com" <elmo@hbmolaw.com>

Mr. Clarke and Ms. Wong,

Due to Judge Caproni's Court Rules requiring meet and confer before counsel can request an adjournment of scheduled court dates, we requested your consent for the adjournment of the final pre-trial conference and trial, and have not heard from you since Tuesday of this week. Please advise whether you consent or object before we file our request to the Court before COB today.

Thank you for your cooperation.

Best regards,
Hugh H. Mo

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On Thu, Jan 20, 2022 at 11:13 AM Hugh H. Mo <hhmo@hbmolaw.com> wrote:

Mr. Clarke and Ms. Wong,

Please advise whether you consent or do not to the alternative dates we provided so that we may write to the Court.

Thank you,
Tracy Wong
Legal Assistant

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On Tue, Jan 18, 2022 at 4:34 PM Hugh H. Mo <hhmo@hbmolaw.com> wrote:

Counsel,

As you know, the Court has scheduled the final pre-trial conference for April 28, 2022, and the bench trial for May 9, 2022, both in person.

However, due to counsel's personal conflicts and being out of town during those dates, we request your consent before we write to the Court requesting adjourning the final pre-trial conference to the weeks of April 18, 2022, or May 18, 2022, and the trial to the weeks of May 23, 2022, May 30, 2022, or June 6, 2022.

Not Available:

April 28, 2022

May 9, 2022

Available dates:

April 18, 2022 - April 22, 2022

May 16, 2022 - May 20, 2022

May 23, 2022 - May 27, 2022

May 31, 2022 - June 3, 2022 (Memorial Day 5/30)

June 6, 2022 - June 10, 2022

Thank you, please advise.

Best regards,

Hugh H. Mo

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Application GRANTED.

The Final Pretrial Conference, currently scheduled for Thursday, April 28, 2022 at 2:00 P.M., is hereby adjourned to **Wednesday, May 18, 2022 at 2:00 P.M.** The bench trial, currently scheduled to commence on Monday, May 9, 2022 at 10:00 A.M., is adjourned to **Tuesday, May 31, 2022 at 10:00 A.M.**

The Court reminds the parties that their proposed findings of fact and conclusions of law as well as their joint pre-trial order are due no later than **Friday, March 4, 2022.** For additional information about those requirements, the parties should consult the Court's order at docket entry 199.

The Court encourages counsel to act courteously and professionally moving forward.

SO ORDERED.



Date: January 26, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE