



July 26, 2022

VIA ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

**RE: 99 Wall Development Inc. v. Allied World Specialty Insurance Company f/k/a Darwin National Assurance Company
Civil Action No.: 1:18-cv-00126 (RA-KHP)**

Dear Judge Abrams:

We represent Plaintiff, 99 Wall Development Inc. ("99 Wall"), in the above referenced matter. The purpose of our letter is to respectfully request an extension of time on 1) the production of the parties' physical exhibits, 2) motions *in limine*. We are joined in this letter by counsel for Defendant, Allied World Specialty Insurance Company ("Allied").

On June 2, 2022, Your Honor entered an Order setting the deadline for the parties' pretrial filings for August 3, 2022. The parties have been working to develop all of their pretrial submissions. Given the volume of exhibits to be submitted, and the recently recommenced settlement communications, the parties respectfully request an extension of time on the submission of their physical trial exhibits with all remaining pretrial deadlines to remain the same. Both parties are prepared to submit their exhibits electronically and will do so by the current deadline, but respectfully request the Court enter an Order allowing the parties to submit physical copies of their exhibits to the Court and each other thirty (30) days in advance of the start date of trial.

Additionally, the parties respectfully request a seven (7) day extension to file their motions *in limine*, which are currently also due on August 3, 2022. The new deadline would be August 10, 2022. All other pretrial filings would remain due on August 3, 2022.

99 Wall thanks the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Stephanie A. Giagnorio

Stephanie A. Giagnorio, Esq.

sgiagnorio@sdvlaw.com

Saxe Doernberger & Vita, P.C.

999 Vanderbilt Beach Rd., Suite 603

Naples, FL 34108

T: (239) 316-7244
F: (203) 287-8847
Attorneys for Plaintiff, 99 Wall Development Inc

cc: Counsel of Record via CM/ECF

Application granted.

The parties shall submit a joint letter by no later than August 3, 2022 proposing potential dates for trial and estimating its length.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
07/28/2022