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MEMO ENDORSED

February 27, 2020

VIA ECF

Honorable Judge Edgardo Ramos United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: Guerra v. Trece Corp. et al; 18-cv-00625-ER

Your Honor:

Our office represents Defendants Trece Corp. d/b/a Trece Mexican Cuisine & Tequila Bar and Joel Lim (hereinafter "Defendants") in the above referenced matter. We write to respectfully request an adjournment of the Case Management Conference currently scheduled for February 28, 2020, at 11:00 a.m. to March 20, 2020, or the next available date. Moreover, Defendants also respectfully request a two-week extension for discovery since Defendants are still producing documents of the Corporate Defendant.

This is Defendants' third request for an adjournment of a conference. The first request (Dkt. No. 22) was granted by Your Honor (Dkt. No. 23) and the second request (Dkt. No. 30) was granted by Your Honor (Dkt. 31). Lastly, Plaintiffs have consented to the proposed adjournment.

We thank the Court for its time and consideration.

Respectfully Submitted,

By: <u>/s/ Lawrence F. Morrison</u> Lawrence F. Morrison. Esq. Morrison & Tenenbaum, PLLC 87 Walker Street, Floor 2 New York, New York 10013 Email: <u>Imorrison@m-t-law.com</u> *Attorneys for Defendants*

CC: VIA ECF David A. Robins Lipman & Plesur, L.L.P. The Jericho Atrium 500 North Broadway Suite 105 Jericho, NY 11753-2131 (516) 931-0050 Email: <u>robins@lipmanplesur.com</u> *Attorney for Plaintiff*

The application is granted
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20. Run
Edgardo Ramos, U.S.D.J
Dated: Feb. 27, 2020
New York, New York