

1345 AVENUE OF THE AMERICAS – 11<sup>TH</sup> FLOOR NEW YORK, NEW YORK 10105 TELEPHONE: (212) 370-1300 FACSIMILE: (212) 370-7889 www.egsllp.com

February 21, 2020

## **VIA ECF**

Hon. Jesse Furman United States District Judge Southern District of New York 500 Pearl Street, Room 1310 New York, NY 10007

Re: Argudo, et al. v. Parea Group LLC, et al. Case No.: 1:18-cv-00678 (JMF)

Dear Judge Furman,

Our firm represents Defendants IMNY GS LLC, GFB Restaurant Corp., Wonderful Restaurant LLC, K.G. IM Management, LLC, Pasta Perfect LLC, IM 60 Street, Il Mulino USA, LLC-1, Gerald Katzoff and Brian Galligan (collectively "Defendants") in the above-referenced matter. In accordance with ¶ 1(E) of Your Honor's Individual Rules and Practices in Civil Cases, Defendants submit this letter motion to respectfully request that Your Honor adjourn the Status Conference currently set for February 27, 2020 at 3:00 p.m., to one of the following alternative dates:

- February 26;
- March 3 (between 3:00 5:00 p.m.); or
- March 9.

The reason for this request is that both partners representing Defendants in this matter have a previously scheduled conference with the General Counsel of the New York State Department of Labor on February 27 at 3:00 p.m. That conference is currently scheduled to take place in Albany, New York.

Plaintiffs' counsel consents to the relief requested herein and have confirmed their availability for the newly proposed dates, as referenced above. This requested adjournment will not affect the litigation otherwise as there are no other scheduled deadlines.



This is Defendants' counsel's second request for an adjournment of a court conference. The previous request was granted by Your Honor (See ECF Dkt. 175).

Respectfully yours,

ELLENOFF GROSSMAN & SCHOLE LLP

Ilan Weiser

cc: All counsel of Record (via ECF)

The conference scheduled for February 27, 2020, is RESCHEDULED to **March 9, 2020**, at **3:00 p.m.** Unless and until the Court orders otherwise, the deadline for discovery remains **March 30, 2020**, and the parties should proceed accordingly. The Clerk of Court is directed to terminate ECF No. 188. SO ORDERED.

February 24, 2020