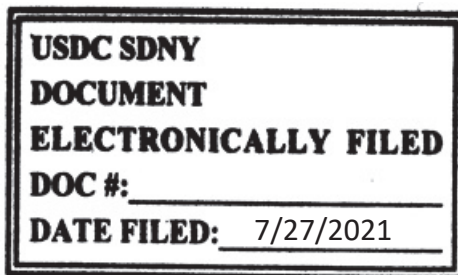


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July 26, 2021

**VIA ECF**

Honorable Stewart D. Aaron  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application GRANTED. SO ORDERED.

Dated: July 27, 2021

**Re: Kairam v. West Side GI, LLC**  
**Civil Action Number 1:18-cv-1005 (AT) (SDA)**

Dear Judge Aaron:

I am an attorney with Gordon Rees Scully Mansukhani, LLP, counsel for defendants WestSide GI, LLC (“WSGI”), Peter Distler, and Ricardo Pou, in the above-referenced consolidated action. Defendants write to respectfully request a 1-month extension of time, from July 28, to August 30, 2021, to file their response to the Consolidated Complaint, filed July 15, 2021 (Docket No. 161). This is the first request for an extension of time to respond to the Consolidated Complaint. Defendants requested plaintiff’s consent to this extension, and plaintiff indicated that she neither consents nor objects to this request.

Defendants request this extension of time in order to complete their analysis of the Consolidated Complaint and draft an appropriate response. The Consolidated Complaint is 53-pages long, with 220 paragraphs and 28 separate and distinct causes of action. It includes extensive allegations spanning the past six years, and, as the Court is well aware, includes the consolidated allegations and claims from Plaintiff’s three separate actions. Given the breadth of the allegations, the 28 causes of action, as well as the complicated procedural history in this suit and certain other deadlines over the next few weeks, Defendants need this extension of time in order to develop an appropriate response to this pleading.

As such, Defendants respectfully request this extension of time, until August 30, 2021, to respond to the Consolidated Complaint.

Thank you for your consideration of this matter.

Respectfully submitted,

GORDON REES SCULLY  
MANSUKHANI, LLP

*Christopher Coyne*

Christopher Coyne, Esq.

cc. Ryan Sestack Esq. (via email & ECF)  
Jeffrey Camhi, Esq. (via email & ECF)  
Elizabeth Shieldkret, Esq. (via ECF)