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May 8, 2024

**VIA ECF**

Honorable Analisa Torres  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Kairam v. Westside GI, LLC***  
**Docket Number 1:18-cv-1005 (AT) (SDA)**

Dear Judge Torres:

The parties in the above-referenced matter write jointly to respectfully request an extension of time to file their respective letter-motions requesting a pre-motion conference, prior to filing their respective motions for summary judgment.

As set forth in this Court's Order dated February 28, 2024 (Docket No. 412), the current deadline to file a pre-motion letter is May 31, 2024. Since the parties' last correspondence to Your Honor, the parties have focused their efforts toward conducting expert discovery<sup>1</sup> and have engaged in ongoing discussions regarding potential resolution of some or all of the matters at issue in this action.

The parties make this extension request in light of the foregoing, the extensive record in this matter, which includes the deposition testimony of nine (9) witnesses and approximately 35,000 pages of documents exchanged in discovery, and the pending nature of Plaintiff's motion for reconsideration which will impact the scope of the parties' anticipated motions. The parties request adequate time to both prepare, exchange and respond to each parties' respective Rule 56.1 Statement of Material Facts, and to submit a request for a pre-motion conference, as required by Your Honor's Individual Practice Rules.

Accordingly, the parties jointly request that for good cause shown, the Court extend the parties' time to file a letter-motion for a pre-motion conference prior to filing a motion for summary judgment from May 31, 2024 to July 12, 2024.

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<sup>1</sup> Due to, *inter alia*, health issues of various counsel, the current deadline to complete expert discovery is June 24, 2024. ECF No. 418.

We thank the Court for its consideration of this matter.

Respectfully submitted,

ELIZABETH SHIELDKRET  
ATTORNEY AT LAW

/s/ Elizabeth Shieldkret  
Elizabeth Shieldkret, Esq.

GORDON REES SCULLY  
MANSUKHANI, LLP

/s/ Jeffrey Camhi  
Jeffrey Camhi, Esq.

cc: Attorneys of Record (via ECF)

GRANTED.

SO ORDERED.

Dated: May 9, 2024  
New York, New York



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ANALISA TORRES  
United States District Judge