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April 27, 2020

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Memo Endorsed

Re: Moses v. Consolidated Edison Co. of New York, Inc., et al.
No. 18-cv-1200-ALC-OTW

Dear Judge Wang:

We write in response to Defendant Con Edison's April 24, 2020 letter to the Court requesting a thirty-day extension of Defendants' deadline to file their opposition to Plaintiffs' Motion for Conditional Certification and Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b) (Dkt. Nos. 114-116 and 123).

As Your Honor is likely aware, on April 17, 2020, a related action, *Ballast v. Griffin Indus., LLC*, No. 1:20-cv-3108, was filed with this Court. We, as counsel for Plaintiffs in the above-referenced *Moses* action, have been in communication with counsel for the *Ballast* plaintiffs, and we have been able to coordinate an agreement to Defendant Con Edison's request to extend Defendants' opposition deadline from April 29, 2020 until May 29, 2020. Thus, Plaintiffs no longer oppose Defendant Con Edison's request, and Plaintiffs request that the deadline for Plaintiffs to file a reply memorandum be extended twenty-one days, from the current deadline of May 29, 2020, to June 19, 2020.

Application Granted. Opposition due May 29, 2020. Reply due June 19, 2020
The Clerk is directed to close ECF 127.

SO ORDERED.



Ona T. Wang 4/27/20
U.S.M.J.

In the coming days, the parties intend to file (i) a joint letter updating the Court on various discovery-related matters; and (ii) a joint stipulation to consolidate this action and the *Ballast* action, along with a proposed consolidated amended complaint.

Kind regards,

/s/ Lydia Keaney Reynolds
Lydia Keaney Reynolds

cc: All counsel (via ECF)

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