

## WOLF HALDENSTEIN ADLER FREEMAN &amp; HERZ LLP

FOUNDED 1888

270 MADISON AVENUE  
NEW YORK, NY 10016  
212-545-4600

LYDIA KEANEY REYNOLDS  
DIRECT DIAL: 212-545-4662  
FACSIMILE: 212-686-0114  
[reynolds@whafh.com](mailto:reynolds@whafh.com)

SYMPHONY TOWERS  
750 B STREET - SUITE 1820  
SAN DIEGO, CA 92101  
619-239-4599

111 WEST JACKSON  
SUITE 1700  
CHICAGO, IL 60604  
312-391-5059

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)

/808731