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<u>VIA ECF</u> Judge Edgardo Ramos Thurgood Marshall U.S. Courthouse 40 Foley Square, Courtroom 619 New York, NY 10007 December 2, 2019 **MEMO ENDORSED** USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #_____ DATE FILED: Dec. 4, 2019

Re: Navarro Zavala et al v. Trece Corp. et al; <u>1:18-cv-01382; U.S. District Court, Southern District of New York</u>

This firm represents Plaintiff in the above referenced matter. I write on behalf of the parties to request the case management conference scheduled for December 6, 2019 be adjourned for thirty days. This is the second request of its kind and is submitted on consent.

The parties are working diligently on finalizing their settlement agreement and fairness motion, but anticipate needing more time to complete their papers and to get the agreement fully executed.¹ As such, the parties respectfully request the case management conference scheduled for December 6, 2019 be adjourned thirty days.

Thank you for your attention.

Respectfully Submitted,

/s/ Jesse S. Barton, Esq. Michael Faillace & Associates, P.C. 60 East 42nd Street, Suite 4510 New York, NY 10165 Tel No. (212) 317-1200 Fax No. (212) 317-1620

Dec. 4, 2019

The request is GRANTED. The case management conference is adjourned to January 16, 2020 at 10:30 AM. It is SO ORDERED.

20 Edgardo Ramos, U.S.D.J Dated: Dec. 4, 2019 New York, New York

¹ My wife gave birth to our second child last month, which delayed the progress of submitting this a bit.