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February 17, 2021

## MOTION FOR EXTENSION OF TIME TO FILE PROPOSED CASE MANAGEMENT PLAN

## BY ECF

Hon. Alison J. Nathan, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 USDC SDNY
DOCUMENT
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DATE FILED: 2/19/2021

Re: Garcia Santana, et al. v. Rego Furniture Inc., et al. Case No. 18-CV-2799 (AJN)

Dear Judge Nathan,

We were retained as counsel to defendants Rego Furniture Inc. and Eli Yahu Grego in the above-referenced matter. We were retained today, February 17, 2021 and we write with reference to the court's order that the parties confer and a case management order be filed in this matter. We are advised that our clients have been financially impacted and forced to close the business due to the Covid-19 pandemic. As a result, we would like to request an extension of all deadlines by one (1) month, in order to confer with plaintiff's counsel, attempt to salvage the settlement, or, file the court-ordered proposed case management schedule.

To our knowledge and understanding based upon our review of the docket this morning, no previous request for similar relief has been made, and no other dates will be affected.

We thank the Court for considering this application.

SO ORDERED.

2/17/2021

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Peter Hans Cooper

Respectfully submitted, Cilenti & Cooper, PLLC

cc: All Parties (Via ECF)

If parties are unable to agree on a settlement, the parties must submit a proposed case management plan by April 15, 2021.