PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

July 28, 2021

VIA ECF

Honorable Katharine H. Parker United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

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Re: Campos, et al. v. BKUK 3 Corporation d/b/a La Carbonara, et al.

Civil Action No. 18 Civ. 4036 (JGK) (KHP)

Macancela, et al. v. Kukaj, et al. Civil Action No. 18 Civ. 7507 (JGK) (KHP) APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

07/29/2021

Dear Judge Parker:

This office represents plaintiffs in the above-referenced action. We write, jointly with John Howley, Esq., counsel in the related matter of *Macancela v. Kukaj*, No. 18 Civ. 7507 (JGK), to respectfully request a one (1) week extension of Plaintiffs' deadline to submit the supplemental materials in connection with Plaintiffs' Motion for Default Judgment and Damages (*Campos* Dkt. Nos. 146-151; *Macancela* Dkt. Nos. 201-206) as set forth in a recent Order of the Court. (*Campos* Dkt. No. 152; *Macancela* Dkt. No. 209).

Plaintiffs' original deadline was July 30, 2021; Plaintiffs request an extension of this date to August 6, 2021. This is the Plaintiffs' first request for extension of this deadline. Defendants have not appeared in this Action for approximately two and one-half (2.5) years, and Plaintiffs are unable to contact them regarding this request. We request this additional time in order to contact each of the Plaintiffs, review and supplement their declarations where necessary, obtain signatures including by hard copy, and give them time to search through their document and records for evidence pertinent to this matter.

We appreciate Your Honor's attention to this matter. Please feel free to contact the undersigned should Your Honor have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Brent E. Pelton

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