



PARTNERS  
 Phillip C. Hamilton, Esq.  
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**MEMO ENDORSED**

May 4, 2022

The Honorable District Court Judge Sidney H. Stein  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, New York 10007-1312

**Re: Varon v. Hakmon, 1:18-cv-04426 (SHS) – Time Extension Request, et al.**

Dear Judge Stein,

Per the Scheduling Order issued in Docket Entry #71 for the above-referenced matter, I am writing to check in with the Court and inquire as to whether the trial for this matter is still set to begin on June 9, 2022. The Plaintiff, Anat Varon, resides in Israel and prior to her confirming travel for the dates of trial, I just wanted to respectfully confirm that we are in fact starting trial that day.

Relatedly, the deadline to submit the joint pretrial order, proposed jury charges, motions in limine, and proposed voir dire, is May 6, 2022, and responses to any motions in limine are due by May 13, 2022. I am respectfully requesting a one-week extension as to both deadlines, respectively, so that the Parties may continue to confer on the joint submissions and have the additional time to respond to motions. My office has been retained as trial counsel in this matter and I filed my Notice of Appearance on March 25, 2022. My schedule in particular since then, including travel for a matter in the Eastern District of Arkansas and a recent personal issue which required my wife to travel to Puerto Rico for a family matter without our children, has pushed me back just a bit and the one-week extensions as to both deadlines will help immensely. Counsel for Defendant Sharon Hakmon does not object to this request.

The final pretrial conference in this matter is scheduled for May 25, 2022. If nothing changes, we will plan to see Your Honor on that date.

Thank you for your consideration of this request.

Regards,

*Phillip C. Hamilton*

Phillip C. Hamilton, Esq.

*May 5, 2022*  
*So verbal.*  
*Sidney H. Stein*