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February 25, 2020

## Via ECF

The Honorable Stewart D. Aaron United States Magistrate Judge for the Southern District of New York 500 Pearl Street New York, New York 10007 USDC SDNY
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Re: Ametepe et al. v. Peak Time Parking, Corp. et al.

Docket No: 18-cv-5384 (PAE)(SDA)

## Dear Judge Aaron:

This office represents the named-Plaintiff, James Ametepe, and the two opt-in Plaintiffs, Pedro Sabala and Emmanuel Boadi (all three as "Plaintiffs"), in the above-referenced matter involving alleged wage violations against Defendants, Peak Time Parking, Corp., and FIH Enterprise Inc., and Sam Dar Enterprises Inc., and AD Parking Inc., and Zafar Majeed, and Fayyaz Khan, and Naveed Anjum, and Mustafa Ali Khandwalla (collectively as "Defendants") under the Fair Labor Standards Act and the New York Labor Law. We write now, on behalf of all parties, to respectfully request a seven-day extension of the parties' joint deadline to submit cross-motions for summary judgment, extending the deadline from February 28, 2020 to March 6, 2020.

Following the settlement conference, the parties have made substantial progress in settlement discussions and are optimistic that the requested extension herein prior to filing the parties' respective cross-motions will aide the parties' efforts to fully resolve the case. Accordingly, the parties respectfully request a seven-day extension of the parties' joint deadline to file their cross-motions only, which if granted, will not affect the parties' joint deadline to oppose the respective cross-motions or joint deadline to submit replies. Therefore, should the parties not reach a settlement, the matter will not be subject to any additional delay. The parties' proposed briefing schedule is as follows: cross-motions due March 6, 2020, opposition papers due

March 30, 2020, reply papers due April 14, 2020. This is the first request for an extension of the parties' joint motion deadline following the parties' settlement conference with the Court.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

For the Firm

To: Defendants' Counsel via ECF

Request GRANTED. SO ORDERED. Stunt d. aun

Dated: February 25, 2020