

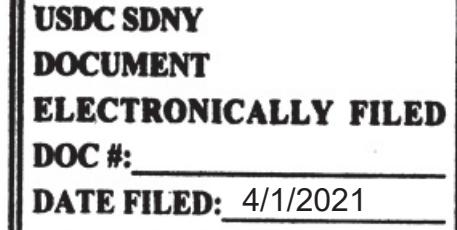


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March 31, 2021

VIA ECF:

Hon. Robert W. Lehrburger, U.S.M.J.
 500 Pearl Street, Room 1960
 United States Courthouse
 New York, NY 10007



Re: **Flores Barreto Pelon, et al. v. Gabi Operating Corp., et al.**
Civil Case No.: 19-cv-00502 (KPF)(RWL)

Dear Magistrate Judge Lehrburger,

We represent Defendants Gabi Operating Corp., Brittgab Corp., Jonathan Banayan and Gabriel Weiser (collectively, “Defendants”) in the above-referenced action and submit this letter motion jointly with counsel for Plaintiffs. In accordance with Your Honor’s Individual Rules, ¶ I(F), and Settlement Conference and Mediation Procedures, ¶ 8, the Parties respectfully request that Your Honor adjourn the settlement conference, currently scheduled for April 7, 2021 (See ECF Dkt. 104), to an alternative date 30 to 45 days from April 7, 2021 or another date that is convenient for the Court. Specifically, the Parties and their counsel are available to attend a settlement conference on any date between May 12, 2021 and May 20, 2021.

The Parties believe they have good reason for this adjournment request as they have made significant progress on settlement in the past few weeks. Specifically, counsel have been in regular communication with each other regarding the negotiation of settlements concerning the Plaintiffs, as well as putative Plaintiffs, and several of those claims have already been in settled in-principle. The parties are hopeful that any remaining claims will be resolved in the coming weeks without the need for further court intervention which would force the Parties to incur additional legal fees and costs.

This is the Parties’ first joint request to adjourn a settlement conference in this matter. Plaintiffs previously requested to adjourn the scheduled settlement conference, which was granted by the Court (Dkt. No. 103).

Respectfully

ELLENOFF GROSSMAN & SCHOLE LLP

Ilan Weiser, Esq.

cc: all counsel of record (via ECF)

{00939851.DOCX.1}

The Court applauds counsel for the progress they have made in resolving this matter. The settlement conference is adjourned to a date to be determined by my Deputy Clerk in consultation with the parties.

SO ORDERED:

4/1/2021

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

