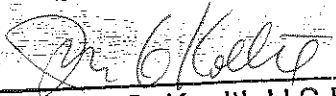


**LAW OFFICES OF MICHAEL W. AYOTTE****APPLICATION GRANTED  
SO ORDERED****VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 14A  
New York, NY 10007-1312

  
John G. Koeltl, U.S.D.J.

September 3, 2021

Re: Watson v. NY DOE 2, et al. (1:19-cv-00533-JGK)  
Plaintiff's Request for a 30-Day Extension to File His Responsive Pleading to  
Illinois Doe 1's Crossclaim (ECF 195)

Dear Judge Koeltl,

Plaintiff submits this letter pursuant to Local Civil Rule 7.1(d) and this Court's Individual Practices, Rule 1.A and 1.E, to respectively request a 30-day extension to file his responsive pleading to Illinois Doe 1's Counterclaim Against Plaintiff Ralph M. Watson, filed on August 19, 2021. ECF 195. The Counterclaim alleges that Plaintiff's current defamation action was filed in violation of New York's recently amended anti-SLAPP laws.

Plaintiff's responsive pleading is currently due on September 9, 2021. Plaintiff, however, contends that the counterclaim was filed in violation of Rule 11 and is objectively unreasonable and has no chance for success in that it cannot state a viable claim. Today, Plaintiff has served (but not filed) on all parties a Notice of Motion and Motion for an Order Imposing Rule 11 Sanctions Against Defendant Illinois Doe 1's Counsel for Presenting Frivolous Claims in a Pleading. Pursuant to the safe harbor provisions of Rule 11, Illinois Doe 1 has 21 days to retract the pleading.

To the extent Illinois Doe 1 retracts her counterclaim, no responsive pleading or Rule 11 sanctions motion would be required. Unless the Court grants Plaintiff's requested 30-day extension, Plaintiff will be required to file a motion to dismiss the counterclaim on September 9, 2021, a date prior to the expiration of the 21-day safe harbor. Granting a 30-day extension will allow the safe harbor period to pass, and to the extent the counterclaim is not retracted, allow Plaintiff a reasonable amount of time to prepare his motion to dismiss.

Based on the foregoing, Plaintiff respectfully requests that the Court extend Plaintiff's time to respond to Illinois Doe 1's counterclaim from September 9, 2021 to October 11, 2021.

**LAW OFFICES OF MICHAEL W. AYOTTE**

Respectfully submitted,

s/ Michael W. Ayotte

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***Michael W. Ayotte***

Law Offices of Michael W. Ayotte

2629 Manhattan Avenue, Suite 144

Hermosa Beach, CA 90254

Telephone: (310) 343-1864

Email: [mayotte@clientfirstlegalsolutions.com](mailto:mayotte@clientfirstlegalsolutions.com)

Attorneys for Plaintiff

RALPH M. WATSON

cc: All counsel of record via ECF