

**MEMO ENDORSED**

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October 13, 2020

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 443
New York, NY 10007

**Re: *Range, Jr. v. BLDG 03 LLC et al.*,
Case No.: 1:19-cv-05276-VEC (S.D.N.Y.)**

Dear Judge Caproni:

This Firm represents Defendants BLDG 03 LLC (“BLDG”) and 475 Soho, LLC (“475 Soho”) (collectively with BLDG, “Defendants”) in the above-referenced matter. We write, with the consent of Plaintiff King Range, Jr. (“Plaintiff”), to respectfully request a one (1) week extension of the parties’ deadline to file a status report from October 15, 2020 to October 22, 2020.

By way of background, this action concerns the accessibility of the Dos Caminos restaurant located at 475 West Broadway, New York, NY 10012 (the “Property”) to individuals with disabilities. On January 14, 2020, the Court Ordered a stay of discovery while Defendants completed accessibility-related alterations to the Property. (ECF No. 36.) The Order required the parties to submit status reports on the 15th of every month regarding the status of Defendants’ work, and the parties’ next status report is due on October 15, 2020. (*Id.*) The reason for the request is as follows:

On Saturday October 10, 2020, despite state of the art security architecture, Seyfarth Shaw LLP was the victim of a sophisticated and aggressive malware attack that appears to be ransomware. Our monitoring systems detected the unauthorized activity and our IT team acted quickly to prevent its spread and protect our systems. While we have no evidence that any of our client or firm data was accessed or removed, our systems were encrypted resulting in our inability to access them at this time. The inaccessible systems include our email and document management systems where our client files and work product are maintained. We have reported the incident to law enforcement and are coordinating with them. We are working around the clock to bring our systems back online as quickly and safely as possible, but do not have an estimate for full restoration at this time.



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Thus, Defendants respectfully request an additional week of time so that we may confer with the appropriate individuals regarding the status of construction at the Property. This is the first request for an extension of this deadline.

Defendants submit this request in good faith and not to cause undue delay. The granting of this extension will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP


/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

Application GRANTED.

SO ORDERED.


10/13/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE