



PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

February 7, 2024

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VIA CM/ECF

MEMO ENDORSED

Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Room 619
New York, New York 10007

The application is X granted
_____ denied

Edgardo Ramos, U.S.D.J
Dated: February 7, 2024
New York, New York

Re: *Ballast, et al. v. Workforce7 Inc., et al.*
Civil Action No.: 20-CV-03812 (ER)

Dear Judge Ramos:

This office represents the plaintiffs in the above-referenced action. We write to respectfully request a short extension of the deadline by which plaintiffs must file a motion for reconsideration of the Court's January 25, 2024 Opinion & Order granting in part and denying in part defendants' motion to dismiss Counts Ten and Eleven of plaintiffs' second amended complaint. (Dkt. No. 309 [the "January 25 Order"]).

Pursuant to Local Civil Rule 6.3, a motion for reconsideration must be served within fourteen (14) days after the entry of the Court's determination of the original motion. Plaintiffs anticipate making a motion for partial reconsideration and, in the alternative, certification of the January 25 Order for an interlocutory appeal, the current deadline for which is Thursday, February 8, 2024. Plaintiffs have conferred with counsel for the defendants and all parties agree to the short extension of the filing deadline and the following briefing schedule for the anticipated motion:

Plaintiffs' Deadline to File the Motion:	February 16, 2024
Defendants' Deadline to Oppose the Motion:	March 1, 2024
Plaintiffs' Deadline to Reply:	March 8, 2024

This is the first request to extend the deadline by which plaintiffs can make a motion for reconsideration of the January 25 Order and it is made on consent of all parties.

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We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

Brent E. Pelton, Esq. of
PELTON GRAHAM LLC

cc: All Counsel (via CM/ECF)