

# BORRELLI & ASSOCIATES

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October 19, 2020

Via ECF

The Honorable Katherine Polk Failla  
United States District Judge for the  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: *Sanayi Beckles-Canton v. Lutheran Social Services of New York., Inc.*  
Docket No.: 20-cv-04379-KPF

Dear Judge Failla:

We represent Plaintiff Sanayi Beckles-Canton in this lawsuit brought under the anti-retaliation provisions of the False Claims Act, 31 U.S.C. § 3703(h), against Defendant Lutheran Social Services of New York, Inc. On September 24, 2020, Defendant filed its motion to dismiss, and pursuant to the Court's August 21, 2020 Order, Plaintiff's opposition is due by October 23, 2020. ECF 14, 16-17. In light of several conflicts that the undersigned has in other matters, we write now - - with Defendant's consent - - to request a two-week extension to November 6, 2020, for Plaintiff to file her opposition. This is Plaintiff's first request for an extension, and if granted, Defendant's reply will be adjourned to November 20, 2020, with no other deadlines in this matter impacted.

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

Respectfully submitted,

/s/ Caitlin Duffy

Caitlin Duffy, Esq.

*For the Firm*

Application GRANTED.

Dated:       October 19, 2020  
              New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE