

October 12, 2020

<u>Via ECF</u> The Honorable Magistrate Judge Sarah L. Cave United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>Guler et al v. Hopsack and Silk Productions, Inc. Et al</u> 20-cv-5559 (PAE)(SLC)

Dear Judge Cave:

We represent the Plaintiff in the above-matter and we submit this status report to request a thirty day extension to file Plaintiff's Motion for Default Judgment due on or before October 13, 2020 pursuant to the Court's September 28, 2020 Order.

To date, Defendants Hopsack and Silk Productions, Inc., Hopsack & Silk Records, Inc. (the "Corporate Defendants") and Valerie Thompson have not appeared in this matter. The Corporate Defendants were served with the Summons and Complaint on August 4, 2020 and Individual Defendant Valerie Thompson was served with the Summons and Complaint on August 7, 2020.

Although Defendants' time to respond to the Complaint has lapsed, Plaintiff has made additional efforts to contact the Defendants to see if they have retained counsel, if they plan to appear in this action, and if they have interest in trying to resolve this matter. Plaintiff is trying to avoid unnecessary motion practice in the event that Defendants intend to appear and defend this action.

To that end, Plaintiff respectfully requests a thirty day extension to file a Motion for Default Judgment. If this request is granted, Plaintiff can file the motion by November 13, 2020. We thank Your Honor for her consideration on this matter and remain available to provide any additional information.

Plaintiff's application for a 30 day extension of time to file the anticipated Motion for Default Judgment is GRANTED. The deadline to file Plaintiff's anticipated Motion for Default Judgment is **Thursday, November 12, 2020**. Plaintiff is reminded to consult the Individual Rules of Practice in Civil Cases of the Honorable Paul A. Engelmayer concerning Default Judgments. The Clerk of Court is respectfully directed to close ECF No. 11.

Respectfully submitted,

/s/ Roman Avshalumov, Esq.

SO-ORDERED 10/13/2020

AH L. CAVE

Doc. 12