

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 2540
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

jbarton@faillacelaw.com

January 7, 2021

VIA ECF

Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: 20-cv-06128-RA Hernandez et al v. Mccbren Corp. et al

Your Honor:

We represent Plaintiffs in the above-referenced matter. We write to respectfully request a three-week extension of the deadline to submit a stipulation of dismissal, without prejudice, currently scheduled for January 11, 2021. This is the first request of its kind and is submitted on consent.

The parties are working diligently on finalizing and executing their settlement materials but anticipate needing a bit more time to do so. As such, the parties respectfully request a three-week extension of the deadline to dismiss.

Thank you for your attention.

Respectfully Submitted,

/s/Jesse Barton
Jesse Barton

Application granted. The parties shall submit a stipulation of dismissal, or otherwise update the Court as to the progress of settlement, by no later than February 1, 2021.

SO ORDERED.



Hon. Ronnie Abrams
January 8, 2021

Certified as a minority-owned business in the State of New York