

BOCHNERIP**Andrew D. Bochner, Esq.**

295 Madison Avenue, 12th Floor
New York, New York 10017

Andrew@BochnerIP.com
Tel: 646.971.0685

Via ECF

January 5, 2020

Hon. Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Graciano v. RJ Brands LLC, Docket No. 1:20-cv-09051 (S.D.N.Y. Oct 28, 2020)
Request to Adjourn Initial Conference Scheduled for January 14, 2021

Dear Judge Schofield:

We are counsel for Defendant RJ Brands LLC (“Defendant”). Pursuant to Section I(B)(2) of Your Honor’s Individual Rules, we write to request an adjournment of the Initial Conference presently scheduled for January 14, 2021.

In support thereof, Pursuant to Section I(B)(2), Defendant submits as follows: (1) the Initial Conference is presently scheduled for January 14, 2021 and Defendant respectfully requests that the Conference be adjourned to March 15, 2021; (2) there have been no previous adjournment requests; and (3) Plaintiff has graciously consented to a 60 day adjournment. Defendant further notes that it only recently retained counsel for this litigation and has only received Plaintiff’s waiver of service today, January 5, 2021. Defendant’s counsel has signed the waiver and thus its Answer will be due March 8, 2021. Defendant is currently conducting an investigation of Plaintiff’s claims.

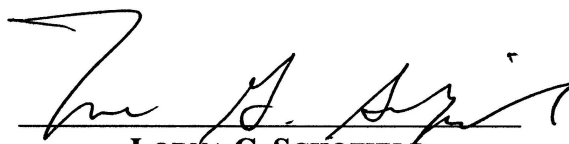
We thank the Court for its time and attention to this request.

Respectfully submitted,
/Andrew D. Bochner/
Andrew Bochner

The application is GRANTED in part. The initial pre-trial conference scheduled for January 14, 2021, at 11:00 a.m., is **adjourned to January 28, 2021, at 11:00 a.m.**, on the following conference call line: 888-363-4749, access code 558-3333. The time of the conference is approximate but the parties shall be ready to proceed by that time. The parties are reminded that their joint letter and proposed case management plan are due a week prior to the conference, or **January 21, 2021**.

SO ORDERED

Dated: January 6, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE