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February 16, 2021

VIA ECF

Hon. Judge John G. Koeltl
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Application granted. SO ORDERED.

New York, New York
February 16, 2021

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

Re: Romero v. Sakar International, Inc.; Case No: 1:20-cv-09218-JGK

Dear Judge Koeltl,

The undersigned represents Plaintiff Josue Romero (hereinafter “Plaintiff”) in the above-referenced matter.

The initial conference for this matter is set for February 16, 2021 at 3:30 p.m. It is now February 16, 2021 and Defendant has yet to appear. Defendants answer was due January 26, 2021. Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court as to Defendant, Sakar International, Inc., and will promptly be moving the Court for a Default Judgment in accordance with its Individual Rules. Counsel for Plaintiff apologizes for not timely requesting the adjournment and will be more timely going forward.

In light of the above, the undersigned requests that the February 16th Conference be adjourned sine die, and further requests that Plaintiff be granted an additional 30 days in which to both obtain said Certificate of Default and present the Court with an Order to Show Cause for default judgment if Defendant fails to appear.

Thank you for your time and consideration of the above request.

Respectfully submitted,

/s/ Joseph H. Mizrahi
Joseph H. Mizrahi, Esq.