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Via ECF and Email (Torres NYSDChambers@nysd.uscourts.gov)

The Hon. Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Neuhauser v. Bolivarian Republic of Venezuela/Case No. 1:20-CV-10342 (AT)

Dear Judge Torres:

We represent plaintiff Alexander Neuhauser ("Plaintiff") in the above-referenced action. Pursuant to section I(C) of Your Honor's Individual Practices in Civil Cases, we submit this letter-motion to request an extension of time until September 11, 2024 to file a revised motion for default judgment.

On July 3, 2023, this Court filed a certain order denying Plaintiff's motion for default judgment without prejudice to renewal, and providing Plaintiff until August 3, 2023 to file a revised motion (see Dkt. No. 43). Previously, on July 20, 2023, this Court granted Plaintiff's first letter motion for an extension of time until September 8, 2023 (see Dkt. No. 45), on September 6, 2023, this Court granted Plaintiff's second letter motion for an extension of time until October 9, 2023 (see Dkt. No. 47), on October 6, 2023, this Court granted Plaintiff's third letter motion for an extension of time until December 6, 2023 (see Dkt. No. 49), on December 5, 2023, this Court granted Plaintiff's fourth letter motion for an extension of time until March 6, 2023 (see Dkt. No. 51), and on March 6, 2024, this Court granted Plaintiff's fifth letter motion for an extension of time until June 6, 2024 (see Dkt. No. 53).

We are requesting this sixth extension of time because on May 29, 2024, we were contacted by Vinson & Elkins, who informed us that they represent the Bolivarian Republic of Venezuela ("Defendant"), and plan to appear in this action on Defendant's behalf. Given this development, the parties' counsel intend to confer regarding the status of this action and how the parties may best move forward in light of the current political situation in Venezuela. To that end, we respectfully request additional time to facilitate these discussions between the parties.

This is Plaintiff's sixth request for an extension of time to file a revised motion for default judgment, and Defendant Bolivarian Republic of Venezuela has not yet appeared in this action to date.

We apologize to this Court for Plaintiff's delay in filing the revised motion and greatly appreciate the Court's consideration. Please let me know if there is any additional information that Plaintiff can provide to the Court related to this request.

Respectfully,

/s/ Joshua H. Epstein

Joshua H. Epstein

cc: Dora Georgescu, Esq., Vinson & Elkins
Andreina Escobar, Esq., Vinson & Elkins

GRANTED.

SO ORDERED.

Dated: June 5, 2024
New York, New York



ANALISA TORRES
United States District Judge