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March 10, 2025

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 June 12, 2025 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, 2024 (see Dkt. No. 51), 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), on June 5, 2024, this Court granted Plaintiff's sixth letter motion for an extension of time until September 11, 2024 (see Dkt. No. 57), on September 10, 2024, this Court granted Plaintiff's seventh letter motion for an extension of time until December 11, 2024 (see Dkt. No. 59), on December 10, 2024, this Court granted Plaintiff's eighth letter motion for an extension of time until March 12, 2025 (see Dkt. No. 62).

We are requesting this ninth extension of time because on June 3, 2024, Vinson & Elkins appeared as counsel on behalf of the Bolivarian Republic of Venezuela ("Defendant") (see Dkt. Nos. 54 and 55). Following this appearance by Defendant's counsel, the parties' are continuing discussions regarding the status of this action and how to best resolve the same. Additionally,

Plaintiff is elderly and unfortunately faces significant and continuing health issues. We have been diligently following up with Plaintiff, but communications have been delayed. To that end, we respectfully request additional time to facilitate these discussions between the parties.

This is Plaintiff's ninth request for an extension of time to file a revised motion for default judgment. 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 (by ECF)
Andreina Escobar, Esq., Vinson & Elkins (by ECF)

GRANTED.

SO ORDERED.

Dated: March 11, 2025
New York, New York



ANALISA TORRES
United States District Judge