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April 23, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 4/27/2021
DATE FILED: 4/27/2021

Re: Nantong Sanhai Garment Co., Ltd. v. Fab Mill, Inc., et al.
Case No. 21-cv-00859 (AJN)

Dear Judge Nathan:

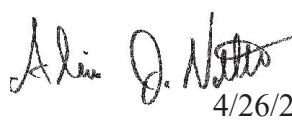
Our firm represents Defendants, Fab Mill, Inc. and Juntai Li a/k/a Jonathan Li, in this matter. We have recently filed a Motion to Dismiss Jonathan Li personally from this action, as well as to dismiss multiple claims of Plaintiff against Fab Mill, Inc.

This Court has scheduled an Initial Pretrial Conference for April 30, 2021, with a Joint Letter and proposed Case Management Plan to be filed on April 23, 2021. With the endorsement of Plaintiff, we write this letter to request an adjournment of the conference and the corresponding filing of the Case Management Plan until the pleadings have been finalized.

In response to Defendants' Motion to Dismiss, Plaintiff has advised the Court that it will be filing an Amended Complaint by May 3, 2021. In addition, your Honor has granted Plaintiff's application to the Court extending to May 17, 2021 Plaintiff's time to respond to the motion (Doc. No. 16). As your Honor's rules provide, we may also file a new motion to dismiss. Based on the foregoing, the parties respectfully submit that it is appropriate to adjourn the scheduling of discovery, and forming a Case Management Plan, until the issues and relief requested in the motion to dismiss are resolved.

Neither party has previously requested an adjournment of the initial conference (the Court, on its own, did adjourn the conference one week from April 23 to April 30). Since Your Honor's rules indicate that an initial conference is generally scheduled within three months of the filing of the Complaint (the Amended Complaint to be filed by May 3, 2021), and since we (a two-person firm) have a trial scheduled for June 7, 2021, the parties propose the following mutually agreeable alternate conference dates, which are on Fridays: June 18, 2021, June 25, 2021, or July 9, 2021.

SO ORDERED.


4/26/2021

The conference is
adjourned sine die
until after the Court's
resolution of the
motion to dismiss.

Respectfully submitted,

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cc: Bingchen Li, Esq.
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