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July 15, 2021

Hon. Alison J. Nathan, U.S.D.J.  
U.S. District Court for the  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

**Re: Letter Request for Adjournment of Case Management Conference of Time to  
in Doncouse v. Birkenstock USA, LP et al Case No. 21-cv-2380 (AJN)**

Judge Nathan:

Freeman Mathis & Gary has recently been retained to represent Defendant Birkenstock USA LP (“Defendant”) in the referenced action (the “Action”) commenced by Plaintiff Graciela Doncouse (“Plaintiff”). We have filed an answer on behalf of Birkenstock. But we request a brief adjournment of the initial pre-trial conference set for July 23, 2021 so that counsel for Birkenstock can gather information about the facts and allegations at issue and meaningfully contribute to the case management report and case management conference.

Counsel for Defendant Birkenstock has conferred with Plaintiff’s counsel, and Plaintiff has no objection to the continuance. As stated above, we only recently received actual notice of service of the complaint and are continuing to gather information about Plaintiff’s claims. On consent of Plaintiff’s counsel, Defendant respectfully requests an adjournment of the initial pre-trial conference until July 30, 2021 or as soon as it may be re-set.

**SO ORDERED.**

**The conference is  
adjourned to August  
6, 2021 at 3:45 P.M.**

7/16/21

Respectfully submitted:

**FREEMAN MATHIS & GARY, LLP**

/s/ Alicia Silver

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