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September 7, 2021

Hon. Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

*The conference is adjourned to 11/10/21
at 2⁰⁰ pm. On or before 11/5/21, plaintiffs'
counsel shall provide a status report on
service that indicates what has been
done since July 30 to achieve service.*

Denise Cote
9/8/21

Re: *Trane International Inc. et al v. Calentadores de America, S.A. de C.V. et al*
Index No. 1:21-cv-04497-DLC

Dear Judge Cote:

We represent Plaintiffs Trane International Inc. and Trane U.S., Inc. (collectively "Trane") in the above captioned action. On May 20, 2021, Your Honor issued a Notice of Pretrial Conference (Dkt. No. 4) setting a pretrial conference for Wednesday, September 15, 2021 at 3:00 P.M. We write to request adjournment of the initial pre-trial conference pending service of process through the Hague Convention.

On July 30, 2021, the Court appointed APS International, Ltd. ("APS") to effect service on Defendants Calentadores de America, S.A. de C.V. and Ariston Thermo Mexico S.A. de C.V. in Mexico through methods prescribed in the Hague Convention. (Dkt. No. 11). APS is currently in the process of serving these foreign Defendants, but service is not yet complete. As the Court may be aware, service in foreign jurisdictions through the Hague Convention may take several months to be completed.

Trane therefore requests an adjournment of the initial pretrial conference until 30 days after Defendants are served in Mexico, or as soon thereafter as is convenient for the Court. Trane requests permission to update the Court in 60 days regarding the status of service.

Defendants have indicated that they take no position on the present motion. No previous requests for adjournment have been submitted. No other dates are scheduled as of yet, and therefore adjournment will not affect the schedule.

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Sincerely,

/s/ Derrick J. Carman

Derrick J. Carman

*Attorney for Plaintiffs Trane
International Inc. and Trane U.S., Inc.*