

ROSSI, CROWLEY, SANCIMINO & KILGANNON, LLP

ATTORNEYS-AT-LAW

42-24 235TH STREET

DOUGLASTON, NEW YORK 11363

TELEPHONE: (718) 428-9180

FACSIMILE: (718) 279-8393

THOMAS J. ROSSI
THERESA E. CROWLEY
SALLY SANCIMINO
TIMOTHY KILGANNON

1551 KELLUM PLACE
MINEOLA, NEW YORK 11501

TELEPHONE: (516) 746-5530
FACSIMILE: (718) 279-8393

January 7, 2022

Via PACER

Honorable Jesse M. Furman
United States District Court – Southern District

Re: Flores et al v. Boro Concrete Corp. et al
1:21-cv-05006-JMF
Joint Letter Motion

Dear Judge Furman:

This office represents Defendants, Boro Concrete Corp, Martin Moore and Eric Chavez in the above referenced action.

I am writing this joint letter with Plaintiffs' counsel's consent to request that the Plaintiffs' Motion for Default against Defendants be withdrawn without prejudice as the parties have agreed to allow Defendants to file an Answer. In addition, the parties have agreed to allow Defendants to file an Answer on or before January 14, 2022 at 5pm.

As such, it is respectfully requested that Your Honor grant this joint letter motion. Thank you for your attention to this matter.

Very truly yours,

Timothy Kilgannon

Timothy Kilgannon, Esq.

Cc: *Via PACER* – Plaintiffs' counsel

Application GRANTED. The Clerk of Court is directed to terminate ECF Nos. 24 and 39.

SO ORDERED.


January 7, 2022