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May 10, 2022

MOTION FOR EXTENSION OF TIME TO FILE REQUEST FOR APPROVAL

BY ECF

The Honorable Barbara Moses
 United States Magistrate Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, New York 10007

MEMO ENDORSED

Re: Oscar Vences v. 99 Cents USA, et. al.
Case No. 21 Civ. 5134 (BM)

Dear Judge Moses,

We are counsel to the plaintiff. We write to inform the court that the settlement agreement has been drafted and approved by counsel, and executed by plaintiff. The *Cheeks* motion is prepared and approved by counsel.

The motion for approval was due yesterday. This is plaintiff's motion for a one-week extension, to May 16, 2022, to file the fully executed settlement and joint request for approval. If the parties are unable to file it by that date, we will ask the court to order defendants to show cause why they have not executed the settlement.

This is our first request for an extension of the deadline (we apologize that is it not timely), and no other dates or deadlines will be affected. Defense counsel has confirmed that they are waiting for their client to execute the settlement, thus necessitating this motion.

We thank the court for its consideration of this case.

Respectfully,

/s/ Peter Hans Cooper

Peter H. Cooper

cc: Stephen D. Hans, Esq. (Via ECF)

Application GRANTED. SO ORDERED.



Barbara Moses, U.S.M.J.

May 10, 2022