



O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036-6537

T: +1 212 326 2000
F: +1 212 326 2061
omm.com

January 6, 2022

Hannah Y. Chanoine
D: +1 212 326 2128
hchanoine@omm.com

District Judge John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Phillips v. Johnson & Johnson Consumer, Inc., 1:21-cv-06866-JPC

Dear Judge Cronan:

This office represents Defendant Johnson & Johnson Consumer, Inc. ("JJCI"). I submit this letter requesting that the January 7, 2022 deadline for JJCI's anticipated motion to dismiss be extended by 30 days, to February 7, 2022. Counsel for plaintiff Bobby Phillips ("Plaintiff") does not oppose the relief sought.

Counsel for Plaintiff and JJCI have met and conferred regarding the strengths and weaknesses of Plaintiff's case. The Parties' discussions remain productive and the Parties therefore respectfully request an additional 30-day extension of JJCI's deadline to respond to the complaint.

Two prior requests for adjournment have been made and both requests were granted.

Respectfully submitted,

/s/ Hannah Y. Chanoine

Defendant's unopposed request for extension of time is granted. Defendant shall respond to the Complaint by February 7, 2022. The parties are reminded that, pursuant to Paragraph 3.B. of the Court's Individual Rules and Practices in Civil Cases, any requests for extensions must be made at least 48 hours (*i.e.*, two business days) prior to the deadline absent compelling circumstances.

SO ORDERED.

Date: January 6, 2022
New York, New York


JOHN P. CRONAN
United States District Judge

**Certificate of Service**

I certify that on January 6, 2022, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Hannah Y. Chanoine