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January 4, 2022

VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204

Re: *Parmar v. Fulton Family Pharmacy Inc., et al.*
Docket No. 21-cv-07826 (AJN)


Dear Judge Nathan:

This firm is counsel to Fulton Family Pharmacy, Inc., GS Pharmacy LLC, Wellcare Pharamcy LLC, Dilip Lavani, and Gita Lavani ("Ms. Lavani" and collectively the "Defendants") in the above-referenced action. We write to respectfully request a 30-day extension of time to February 6, 2022 to respond to the Complaint and to adjourn the initial conference to a date and time convenient for the Court. Seven days prior to the rescheduled initial conference date and pursuant to Your Honor's Order at Dkt No. 4, the Parties will submit a joint letter, case management plan, and will advise Your Honor as to whether they believe a conference is necessary in this matter.

SO ORDERED.

The reason for this request is that Ms. Lavani has been, and is currently tending to a family emergency, which required her to travel overseas. In addition, the Parties are still exploring the possibility of an early resolution and the additional time will allow the Parties to continue these discussions prior to expending the time and resources associated with responding to the Complaint and engaging in formal discovery practice.

The Plaintiff takes no position concerning this request. This will be Defendants' second request to extend the time to respond to the Complaint and first request to adjourn the initial conference. Thank you for the Court's consideration of this request.



1/10/22
SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

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Respectfully submitted,

Little Mendelson P.C.

/s/ Keegan B. Sapp

Keegan B. Sapp

cc: All attorneys of record (via ECF)