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Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: *Upsolve, Inc., et al., v. James, 22-CV-627 (PAC)*

Dear Judge Crotty:

We represent Plaintiffs Upsolve, Inc. and Rev. John Udo-Onkon in connection with the above-referenced matter. On May 24, 2022, the Court issued an Opinion and Order granting Plaintiffs' Motion for a Preliminary Injunction and ordering the parties to submit a Civil Case Management Plan by June 3, 2022 (ECF 68). We respectfully request that this deadline be extended to July 15, 2022. Defendant consents in this request. This is Plaintiffs' first request for an extension of the Court's deadline by which to file a Civil Case Management Plan.

On May 31, 2022, Defendant filed a request to extend Defendant's time to answer the Complaint to July 15, 2022 (ECF 70). In light of Defendant's request and the important issues raised by this action, an extension of the deadline to file a Civil Case Management Plan will best allow the parties to jointly resolve how and on what timeline this action should proceed.

Respectfully submitted,

/s/ Gregory Silbert
Gregory Silbert

cc: Counsel of Record (via ECF)