

## THE SAMUEL LAW FIRM

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March 5, 2025

ADMITTED IN NY

The Hon. Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

## MEMO ENDORSED

**Re: *Marcos Vera v. Colgate Deli & Grocery Corp. et al.***  
**Case No. 22-cv-2058 (ER)**

Dear Judge Ramos,

We are attorneys for plaintiff Marcos Vera ("Plaintiff") in the above-entitled wage and hour case and write to respectfully request an adjournment of tomorrow's 10:00 a.m. contempt hearing relating to Defendants' failure to comply with the Court's January 22, 2025, Order (ECF 39) to respond to Plaintiffs' information subpoenas.

This is the first such request for adjournment and Plaintiff believes adjournment of tomorrow's contempt hearing is advisable at this time because Defendant Mohamed Abisse telephoned Plaintiff's counsel yesterday to express his intention to begin paying the judgment entered by the Court on October 7, 2022 (ECF 23).

We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Respectfully submitted,

The request to adjourn the hearing currently scheduled for March 6, 2025 is granted.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: March 5, 2025

New York, New York

/s/ Michael Samuel  
Michael Samuel, Esq.