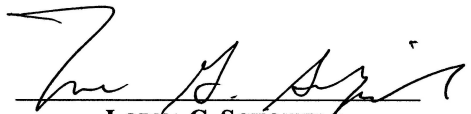


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LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Via ECF Filing

Honorable Lorna G. Schofield
U.S. District Court – SDNY
500 Pearl Street
New York, New York 10007

September 16, 2022

Application **GRANTED**. Defendant shall file its motion to dismiss by **October 16, 2022**. Plaintiff shall file an opposition by **November 7, 2022**. Defendant shall file a reply by **November 14, 2022**. The parties shall comply with the Court's Individual Rules in filing their motions and supporting papers.

Re: *Cristian Sanchez v. BTO America Limited*
Case No.: 1:22-cv-02419-LGS

Dear Judge Lorna G. Schofield:

Dated: September 19, 2022
New York, New York

Pursuant to your Honor's Order dated July 27, 2022, the Defendant BTO America Limited was required to file its motion to dismiss the above referenced action pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) on or before September 16, 2022. As stated in the previously filed joint letter, I have been unable to reach my client and have had no any communication for weeks. I have found out that the principal lives in Australia and the associate that was communicating with me was terminated from the Company. I have sent numerous emails and made calls but to date I have not heard back. As such I cordially request an extension of 30 days to file the motion. (I am out of the country for 7 days during this time). Additionally, Plaintiff's counsel and I have had settlement discussions but I have been unable to communicate those with my client. As such I cordially request to extend the briefing schedule as follows.

1. Defendants motion to be filed on or before October 16, 2022
2. Plaintiff's opposition to be filed on or before November 7, 2022.
3. Defendants reply to be filed on or before November 14, 2022.

Plaintiff's counsel has consented to this extension request. I apologize for this late notice as I was hoping and waiting for my client to respond to my messages. I thank this honorable Court for its review of this request.

Respectfully submitted,

/s/ Mitchell Segal

Mitchell Segal

By ECF

Cc: All counsel of record