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July 8, 2024

VIA ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

RE: *Gao v. L&L Supplies, Inc., et al.*, No. 1:22-cv-3722 (JLR) (GWG)
Request for Adjournment of Trial and Related Deadlines

Dear Judge Rochon:

We are pro bono counsel to defendant Youpeng Li, and write pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice in Civil Cases to respectfully request an adjournment of the bench trial currently scheduled to commence on July 18, 2024, at 10:00 a.m., as well as a commensurate adjournment of the associated pre- and post-trial deadlines. (*See* ECF Nos. 72.) This is Mr. Li's first request for an adjournment of the trial date. We have conferred with pro se defendant Susan Liang and counsel for plaintiff Hua Jing Gao, both of whom consent to this request. All parties are available for trial in the month of September at a date that is convenient for the Court.

As the Court is aware, despite diligent effort, we did not finalize our engagement to represent Mr. Li at trial until June 26, 2024—more than three weeks after the Court set the current trial date. (*See* ECF Nos. 72, 76-77.) We have since been diligently working to get up to speed on the case amidst a number of conflicts in other matters and competing deadlines. Our preparation is also inherently slowed due to the language and logistical issues of coordinating with Mr. Li. Accordingly, we no longer believe that trial next week is feasible.

We do not make this request lightly. We appreciate the Court's heavy docket, the inconvenience of rescheduling a matter as important as trial, and the need to move this case swiftly to resolution. However, we believe that a short extension is

needed to adequately prepare for trial. We initially proposed requesting an adjournment just until August, but we could not find August dates that worked for all parties and counsel.

Accordingly, we respectfully propose the following new dates for trial and the related pre- and post-trial deadlines:

- ***Trial.*** Any two consecutive business days in September that are convenient for the Court.
- ***Motions in limine.*** Ten days before the new trial date, with oppositions to any such motions due seven days before trial (the same length of time as the current deadlines).
- ***Post-trial proposed findings of fact and conclusions of law.*** Fifteen days after trial concludes (also the same length of time as the current deadline (*see* ECF No. 80)).

We thank the Court for its attention to this matter. We are available at the Court's convenience to answer any questions regarding this request.

Respectfully submitted,




Michael C. Griffin

cc: All counsel of record via ECF
Susan Liang via email and ECF

The request to adjourn the trial is GRANTED. The trial will now commence on **October 17, 2024, at 10:00 a.m.** The parties must submit any motions *in limine* by **September 13, 2024, at 5:00 p.m.** The parties must submit any responses to motions *in limine* by **September 20, 2024, at 5:00 p.m.** The parties are advised to be judicious in filing motions *in limine* given that this is a bench trial. The parties must submit proposed findings of fact and conclusions on law by **November 6, 2024, at 5:00 p.m.**

Dated: July 8, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge