Document 267

Filed 10/22/24

Page 1 of 2



Nixon Peabody LLP 70 W. Madison Street, Suite 5200 Chicago, IL 60602-4378

John T. Ruskusky Partner

Attorneys at Law nixonpeabody.com @NixonPeabodyLLP

T / 312.977.4460 F / 844.571.6779 jtruskusky@nixonpeabody.com Doc. 268

October 22, 2024

BY ELECTRONIC FILING

The Honorable Arun Subramanian **United States District Court** Southern District of New York 500 Pearl St., Room 15A New York, New York 10007

RE: Makina ve Kimya Endustrisi A.S. v. A.S.A.P. Logistics Ltd., et al. No.: 1:22-cv-03933 (PGG)

Dear Judge Subramanian:

Plaintiff Makina ve Kimya Endustrisi A.S. ("MKE") writes to request a brief extension of the deadline for filing its motion for attorney's fees pursuant to 15 U.S.C. § 1117(a) (the "Fees Motion"). See Dkt. 261, 3. Defendants Debbie Cross, ASAP Logistics Ltd., ASAP Logistics and Defense Security Services Ltd., and ASAP Logistics Ve Savunma Ticaret Limited Sirketi (collectively, the "ASAP Defendants") do not oppose MKE's request.

Pursuant to the Stipulation of Judgment entered on October 1, 2024, MKE's Fees Motion is due on or before October 25, 2024. *Id.* As noted during the conference last week, one of MKE's counsel has been limited due to a medical matter. Due to this limitation, MKE respectfully requests that the deadline to file the Fees Motion be extended to October 30, 2024. MKE also requests that the ASAP Defendants have until November 20, 2024 to file a response, and that MKE have until November 27, 2024 to file a reply.

We thank the Court for its attention to this matter.

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 267.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: October 23, 2024

NIXON PEABODY LLP ATTORNEYS AT LAW

NIXONPEABODY.COM @NIXONPEABODYLLP

Respectfully submitted,

By: /s/ John Ruskusky
John T. Ruskusky
Alper Tosun
NIXON PEABODY LLP
55 W. 46th Tower 46
New York, New York 10036
(212) 940-3000
jtruskusky@nixonpeabody.com
atosun@nixonpeabody.com

By: /s/ Richard Mandel
Richard Mandel
Jeremy A. Berman
COWAN, LIEBOWITZ & LATMAN, P.C.
114 West 47th Street
New York, NY 10036-1525
(212) 790-9291
rsm@cll.com
jab@cll.com