

**STEIN | SAKS, PLLC**

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September 14, 2022

Via CM/ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York

Re: **Zinnamom v. Shahid, Inc.**
Case #: **1:22-cv-05912-VSB**

APPLICATION GRANTED**SO ORDERED**
VERNON S. BRODERICK**U.S.D.J.** 09/15/2022

Plaintiff is advised that future extension requests are unlikely to be granted barring extenuating circumstances.

Dear Judge Broderick:

We represent the plaintiff in the above matter. Pursuant to the Court's order of September 7, 2022, we write to respectfully request an extension of 30 days to seek a default judgment against Defendant. This is the first such request in this matter.

Plaintiff has obtained the Clerk's Certificate of Default on September 8, and has mailed it to Defendant's business address. Given the additional time, we intend to reach out to Defendant to impress upon him the importance of answering the complaint, before proceeding with a default judgment in accordance with Rule 4(H) of Your Honor's Individual Rules and Practices in Civil Cases.

We thank Your Honor and the Court for its kind considerations and courtesies.

Respectfully submitted,

s/ Mark Rozenberg
Mark Rozenberg, Esq.

cc: All Counsel of Record via ECF

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