



30 Ramland Road, Suite 201 Orangeburg, New York 10962 TEL: 845.589.9300 FAX: 845.638.2707

November 18, 2022

Via ECF

Honorable Lorna G. Schofield, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: LOADHOLT v. THE QUICKZIP SHEET COMPANY, INC.
1:22-cv-07310-LGS**

*Letter Motion for Defendant's Extension of Time to Respond to Plaintiff's
Amended Complaint*

Dear Judge Schofield:

Defendant The QuickZip Sheet Company, Inc. ("Defendant" or "QuickZip"), through counsel, pursuant to Rule I.B.2. of Your Honor's Individual Rules and Procedures for Civil Cases, respectfully submits this request for a two-week extension of time, from November 23, 2022 until December 7, 2022 to answer Plaintiff's Amended Complaint filed on November 9, 2022 in this matter (Dkt No. 21).

The parties have been engaged in intensive and productive settlement negotiations, and are hopeful that a brief extension of the deadline will help the parties reach a negotiated resolution of this dispute that would obviate the need for a responsive pleading and continued progression through the discovery process.

This is Defendant's second request for an extension of time to answer a pleading, and the first request for an extension of this particular pleading deadline, and it is made with the consent of Plaintiff's counsel. We thank Your Honor for the attention to and consideration of this request.

Respectfully,
/s/ Kevin Doherty
Kevin Doherty, Esq.

cc: All counsel of record via ECF

Application GRANTED. Defendant shall answer, move or otherwise respond to the Amended Complaint by December 7, 2022.

Dated: November 21, 2022
New York, New York

A handwritten signature in black ink, appearing to read "LORNA G. SCHOFIELD".

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE