

**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY 10165
T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

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MEMORANDUM ENDORSED**VIA ECF**

Hon. Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Telebrands Corp. v. Adward runbaifan, et al.*
Civil Case No. 23-cv-1063
Fourth Request for Extension of Time to File Application for an Order to Show Cause for Default Judgment

Dear Judge Woods,

We represent Plaintiff Telebrands Corp. (“Plaintiff”), in the above-referenced matter (the “Action”). On September 21, 2023, the Court entered an Order directing Plaintiff to file any application for an order to show cause for default judgment (“DJ OSC”) by no later than October 15, 2023. On October 2, 2023, Plaintiff filed its first request for an extension of time to file its DJ OSC (Dkt. 43), which the Court granted and extended Plaintiff’s deadline to file its DJ OSC until November 17, 2023. (Dkt. 44). On November 13, 2023, Plaintiff filed its second request for an extension of time to file its DJ OSC (Dkt. 48), which the Court granted and extended Plaintiff’s deadline to file its DJ OSC until January 31, 2024. (Dkt. 49). On January 26, 2024, Plaintiff filed its third request for an extension of time to file its DJ OSC (Dkt. 50), which the Court granted and extended Plaintiff’s deadline to file its DJ OSC until March 29, 2024 (Dkt. 51). For the reasons set forth herein, Plaintiff respectfully requests a fourth extension of time, until April 26, 2024, to file its DJ OSC. In accordance with Your Honor’s Individual Rules of Practice, Plaintiff respectfully submits the following:

1. **Original Deadline:** March 29, 2024
2. **The number of previous requests for extension:** Three, this is the fourth request for an extension of time to file Plaintiff’s DJ OSC.
3. **The reason for the current request:** Plaintiff respectfully requests an extension of time so that it can continue engaging in the settlement discussions it is having with a handful of the Defendants remaining in the Action. Moreover, Plaintiff is in the process of attempting to serve some of the remaining Defendants via the Hague Convention, and none of the services have been completed at this time.
4. **Whether the adversary consents:** All of the Defendants remaining in this action are currently in default, thus Plaintiff did not seek their consent.

5. **Proposed alternative dates:** Based on Plaintiff's counsel's experience in similar cases, Plaintiff does not anticipate receiving the results of the attempted Hague service for several months at best. Accordingly, at this time, Plaintiff respectfully proposes filing its DJ OSC against only those Defendants for whom the Hague Convention does not apply by no later than April 26, 2024 to allow any ongoing settlement discussions to conclude. Plaintiff further respectfully proposes providing the Court with an update regarding the Hague service at the time it files the DJ OSC.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP


BY: /s/ Danielle S. Futterman
Danielle S. Futterman (DY 4228)
dfutterman@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff

Application granted. Plaintiff's fourth request for an extension of time to seek an order to show cause for default judgment is granted. Dkt. No. 52. To accommodate the time required to complete Hague Service, the Court expects that Plaintiff will file a request for an order to show cause for default judgment against all Defendants remaining in the case, in accordance with the Court's Individual Rules of Practice in Civil Cases, by August 30, 2024. Plaintiff is directed to serve a copy of this Order on all Defendants and retain proof of service.

The Clerk of Court is directed to terminate the pending motion at Dkt. No. 52.

SO ORDERED.

Dated: March 27, 2024
New York, New York



GREGORY H. WOODS
United States District Judge