

## LEVIN-EPSTEIN & ASSOCIATES, P.C.

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November 13, 2023

**Via ECF**

The Honorable Jessica G. L. Clarke, U.S.D.J  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: *Brown et al v. CE Solutions Group, LLC et al*  
**Case No.: 23-cv-03029**

Dear Honorable Judge Clarke,

This law firm represents Plaintiffs Darnell Brown, Jeremiah Jones, Ronald Turner, Terri Coleman, Phillip Barnes, Charles Shokanji, Joseph Miranda, Andres Reyes, Smithfuerte Reyes, Jadrien Smith, Melissa Thompson and Ticky Rowe (collectively, the “Plaintiffs”) in the above-referenced matter. This letter is submitted jointly with counsel for Defendants CE Solutions Group, LLC, CE Solutions Inc. and Jeannine Napoleone-Colbert (collectively, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves as a request to extend the parties’ deadline to respond to Your Honor’s October 12, 2023 Order [Dckt. No. 42] from November 13, 2023 to, through and including, December 13, 2023.

This is the second request of its nature. If granted, this request would not affect any other Court scheduled deadlines.

The basis of this request is that the parties are still working on finalizing the necessary paperwork to effectuate the disposition of this matter.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

Application GRANTED. The deadline is extended to December 13, 2023. Further extensions are unlikely to be granted. The parties are reminded that, per the Court’s Individual Rules, requests for extensions must be made at least 48 hours prior to the deadline. The Clerk of Court is directed to terminate ECF No. 45.

SO ORDERED.

*Jessica Clarke*

JESSICA G. L. CLARKE  
United States District Judge

Dated: November 14, 2023  
New York, New York

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