

# B R A U N H A G E Y & B O R D E N LLP

San Francisco & New York

**Melissa Ginsberg, Esq.**  
[ginsberg@braunhagey.com](mailto:ginsberg@braunhagey.com)

March 5, 2025

**VIA ECF**

The Honorable Jennifer L. Rochon  
U.S. District Court for the Southern District of New York  
United States District Court  
500 Pearl Street  
New York, NY 10007

**Re: *Murchinson Ltd. v. Nano Dimension Ltd.*, Case No. 23-cv-3658 (JLR) –  
Request to Briefly Adjourn Argument Date**

Dear Judge Rochon:

We represent Nano Dimension Ltd. (“Nano”) in the above-referenced action.<sup>1</sup> We write to request a brief adjournment of the April 17, 2025 oral argument on Defendants’ pending motion to dismiss to accommodate counsel’s pre-planned vacation. Plaintiffs Murchinson Ltd., EOM Management Ltd., Nomis Bay Ltd., and BPY Limited have no objection to this motion.

By way of background, on August 9, 2023, Defendants filed a Motion to Dismiss the Complaint (the “Motion”) for lack of jurisdiction and failure to state a claim. That Motion was fully briefed on September 26, 2023. On February 20, 2025, the Court issued an order scheduling oral argument on the Motion on March 6, 2025. (Dkt. 90.) On February 28, 2025, Plaintiffs and Nano filed a joint motion requesting a 45-day adjournment of that argument date to allow the parties to complete settlement discussions. (Dkt. 91.) On March 3, 2025, the Court granted that request and adjourned the argument on the Motion to April 17, 2025. (Dkt. 92.) This is the second request for an adjournment of the oral argument on the Motion.

I am scheduled to be out of the country on a pre-planned vacation on April 17, 2025. Accordingly, we respectfully request that oral argument on the Motion is further adjourned to the week of April 21, 2025. We have conferred with Plaintiffs’ counsel concerning their availability and confirmed that both we and Plaintiffs’ counsel are available on April 21, 22, 24, or 25.<sup>2</sup>

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<sup>1</sup> BraunHagey & Borden LLP (“BHB”) is also counsel of record for Yoav Stern, Amit Dror, Simon Anthony-Fried, Channa Caspi, Roni Kleinfeld, J. Christopher Moran, Yoav Nissan-Cohen and Igal Rotem (the “Individual Defendants”). BHB intends to file a motion to withdraw as counsel for the Individual Defendants in light of the potential for a conflict to develop between Nano and the Individual Defendants due to the recent changes to the composition of Nano’s board of directors and management.

<sup>2</sup> I am scheduled for a medical procedure on April 30, 2025 and will be unavailable for argument on that date and through May 9, 2025 while recovering.

**San Francisco**  
747 Front Street, 4th Floor  
San Francisco, CA 94111  
Tel.: (415) 599-0210  
Fax: (415) 276-1808

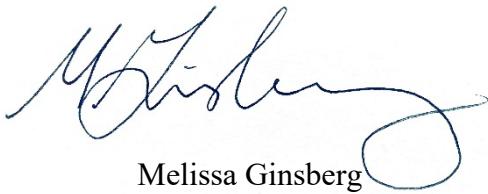
**New York**  
118 W 22nd Street, 12th Floor  
New York, NY 10011  
Tel.: (646) 829-9403  
Fax: (646) 403-4089

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We appreciate the Court's attention to this matter.

Respectfully submitted,



Melissa Ginsberg

Cc: Counsel of Record by ECF  
Individual Defendants by email & FedEx

Request GRANTED. The oral argument currently  
scheduled for April 17, 2025, shall be adjourned to  
**April 24, 2025, at 11:00 a.m.**

Dated: March 6, 2025

New York, New York

**SO ORDERED.**



JENNIFER L. ROCHON  
United States District Judge