

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

60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
 T: 212.792-0048 • E: [Jason@levinestein.com](mailto:Jason@levinestein.com)

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**MEMO ENDORSED**

**VIA ECF**

The Honorable Valerie E. Caproni, U.S.D.J.  
 U.S. District Court, Southern District of New York  
 40 Foley Square  
 New York, NY 10007

Re: *Smith v. Proguard Protection Inc. et al*  
Case No.: 1:23-cv-03694-VEC

Dear Honorable Judge Caproni:

This law firm represents Plaintiffs Aaron Smith, Tyishia Dudley, Colman Goncalvez, Samuel Deadwyler (collectively, the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to comply with Your Honor’s October 12, 2023 Order [Dckt. No. 20], from November 12, 2023 to, through and including December 13, 2023.

This is the first request of its kind, and is made on consent of counsel for Defendants Robert Hall, Richard Stanley and Proguard Protection Inc. (collectively, the “Defendants”).

The basis of this request is that the parties require additional time to finalize the necessary paperwork to effectuate the dismissal of the instant action. The parties anticipate being in a position to respond to Your Honor’s October 12, 2023 Order [Dckt. No. 20] on or before December 13, 2023.

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

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
 Jason Mizrahi, Esq.  
 60 East 42<sup>nd</sup> Street, Suite 4700  
 New York, New York 10165  
 Tel. No.: (212) 792-0048  
 Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)  
*Attorneys for Plaintiff*

VIA ECF: All Counsel

Application GRANTED. The parties' deadline to file a joint letter motion requesting the Court approve their settlement agreement in accordance with the Court's October 12, 2023, order at Dkt. 20 is extended until **Wednesday, December 13, 2023**. The Court is highly unlikely to grant further extension requests absent extraordinarily good cause.

If no letter or stipulation is filed by **Wednesday, December 13, 2023**, a conference shall be held on **Friday, December 15, 2023, at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York 10007.

The conference scheduled for Friday, November 17, 2023 at 10:00 A.M. is CANCELED.

Pursuant to Rule 2(C) of the Undersigned's Individual Practices, extension or adjournment requests must be made at least 48 business hours prior to the original due date absent an emergency. Counsel are admonished that any future extension or adjournment requests made in violation of the Undersigned's Individual Practices may be denied on that basis alone.

SO ORDERED.



11/13/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE