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November 14, 2023

**VIA ECF AND REGULAR MAIL**

Hon. Jennifer L. Rochon, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

Re: *Manny Pastreich, et al. v. Aecom Special Mission Services Inc. et al.*,  
Case No. 1:23-cv-03876-JLR

Dear Judge Rochon:

The undersigned represents Defendants in the above-referenced matter. The parties jointly submit this letter motion pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice requesting a 60-day extension of time for Defendants to respond to the Complaint, and to adjourn the Initial Pretrial Conference scheduled for November 29, 2023.

The current deadline for Defendants' response to the Complaint is November 17, 2023, and the Initial Pretrial Conference is currently scheduled for November 29, 2023 at 10:30 a.m. (Dkt. 11.)

The requested 60-day extension will make Defendants' response to the Complaint due January 16, 2024. The parties have conferred and are mutually agreeable to reschedule the Initial Pretrial Conference for January 24, 2024, January 31, 2024, or February 7, 2024 at a time of the Court's convenience.<sup>1</sup>

The purpose of the requested extension and adjournment is to give Plaintiffs' auditors additional time to complete their assessment of the copious financial data that Defendants produced to Plaintiffs in connection with the parties' ongoing settlement negotiations. The parties are mindful that they previously advised the Court that they would not seek further extensions of these deadlines. (Dkt. 10). However, given the volume of data involved and the need for

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<sup>1</sup> The parties will file a proposed Civil Case Management Plan and Scheduling Order and the joint letter required by Rule 1(D) within seven calendar days before the conference date scheduled by the Court.

# BLANKROME

Hon. Jennifer L. Rochon, U.S.D.J.

November 14, 2023

Page 2

Plaintiffs' auditors to complete their assessment, it has become apparent that more time is in fact needed for the parties to complete their settlement negotiations. The parties agree that the requested extension and adjournment is in their respective interests and in the interest of judicial economy.

The Court previously so-ordered the parties' stipulation extending Defendants' deadline to respond to the Complaint. (Dkt. 5.) There has also been two prior requests for adjournment or extensions of time, which the Court granted. (Dkt. 8, 11.) The requested extension and adjournment do not affect any other scheduled dates.

Respectfully submitted,

*/s/ John C. Kessler*

John C. Kessler

cc: All Counsel (via ECF)

The requests are GRANTED. Defendants shall respond to the Complaint by **January 16, 2024**. The initial pre-trial conference is adjourned from November 29, 2023 to **January 24, 2024 at 3:00 p.m.**

Dated: November 15, 2023  
New York, New York

**SO ORDERED.**



**JENNIFER L. ROCHON**  
United States District Judge