



Connell Foley LLP  
875 Third Avenue, 21<sup>st</sup> Floor  
New York, NY 10022  
P 212.307.3700 F 212.262.0050

**Michael Bojbasa**  
Of Counsel  
MBojbasa@connellfoley.com

November 15, 2023

**VIA ECF**

Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: Lourdes Ventura v. Costco Wholesale Corporation**  
**Docket No.: 23-CV-06446(SHS)**

Dear Judge Stein:

We represent the defendant Costco Wholesale Corporation (“Costco”) in the referenced matter and write here on behalf of both parties to request an adjournment of tomorrow’s Initial Pretrial Conference scheduled for 2:30 p.m.

Plaintiff’s counsel advised our office this afternoon that Plaintiff has agreed to a stipulation capping damages and remanding the matter back to state court for further proceedings. We have provided Plaintiff’s counsel with an appropriate stipulation for execution by counsel and Plaintiff, however the parties require additional time to finalize the stipulation so that it may be submitted to the Court.

The parties jointly request that tomorrow’s Initial Pretrial Conference be adjourned for the reasons stated above. This is the parties second request for an adjournment of the Initial Pretrial Conference. Lastly, the parties apologize for the lateness of this request. The attorney handling this matter on behalf of Costco, Frank J. Pina IV, unexpectedly fell seriously ill earlier this week which caused the delay in the parties seeking this adjournment from the Court.

Your Honor’s consideration of this matter is greatly appreciated.

Respectfully submitted,

*Michael Bojbasa*

Michael Bojbasa

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia

[www.connellfoley.com](http://www.connellfoley.com)

cc:

**VIA E-MAIL**

Michelle Jean-Jacque, Esq.

**HARMON LINDER & ROGOWSKY**

Attorneys for Plaintiff

**LOURDES VENTURA**

3 Park Avenue, Suite 2300

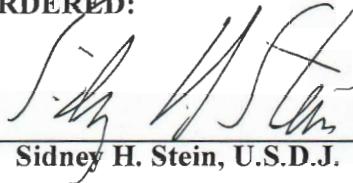
New York, New York 10016

(212) 732-3665

The conference is adjourned to December 7, 2023, at 2:30 p.m.

**Dated: New York, New York**  
**November 15, 2023**

**SO ORDERED:**



Sidney H. Stein, U.S.D.J.