

STEVENSON MARINO LLP

Jeffrey R. Maguire, Esq., Partner o: (212) 939-7229 f: (212) 531-6129
a: 445 Hamilton Avenue, Suite 1500, White Plains, NY 10601
e: jmaguire@stevensonmarino.com

APPLICATION GRANTED
SO ORDERED *Vern Bro*

VERNON S. BRODERICK
U.S.D.J.

Dated: July 9, 2024

Via ECF

The Honorable Vernon S. Broderick
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

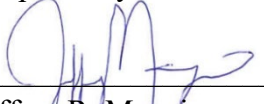
Re: *Ubri v. Majestic Associates LLC et al.*
Docket No: 23-cv-7954 (VSB)

Dear Judge Broderick:

We represent Plaintiff Eduardo Ubri in the above-referenced matter against Majestic Associates LLC, Majestic Property Associates LLC, 3871 Village Associates LLC, and Joshua Balsam (hereinafter, Majestic Property Associates LLC, 3871 Village Associates LLC, and Joshua Balsam are collectively referred to as “Defendants”). We write now, on behalf of Plaintiff and Defendants, to respectfully request a thirty-day extension of the parties’ deadline to file their motion for approval of Plaintiff’s FLSA claims pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), extending the deadline from July 5, 2024, to August 5, 2024. The basis for the request is to provide the parties with additional time to finalize the settlement agreement and corresponding motion papers. This is the first request for this extension and does not affect any other dates.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Jeffrey R. Maguire
Stevenson Marino LLP

To: Defendants’ Counsel *via* ECF