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November 14, 2023

**By ECF**

Honorable P. Kevin Castel  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Klauber Brothers, Inc. v. 8647313 Canada Inc., et al.*;  
Case No. 23-cv-08039(PKC)

Dear Judge Castel:

This firm represents Defendants 8647313 Canada Inc. dba JS Group International and Key Unger, The Neiman Marcus Group LLC, Nordstrom, Inc., Saks.com LLC, and Dillard's Inc. (collectively, "Defendants") in the above referenced matter. Pursuant to Section 1B of Your Honor's Individual Practices in Civil Cases, we write to respectfully request an adjournment of Defendants' time to respond to the Complaint until December 13, 2023. The parties have been in discussions over the past several months regarding a possible resolution of this action, and Defendants are working to obtain information to further facilitate those discussions. Plaintiff had informally agreed to extend Defendants' time to respond to the Complaint during this period, although the present request is Defendants' first formal request for an extension of this deadline. Plaintiff consents to the requested adjournment.

In light of this request, both parties also respectfully request an adjournment of the Initial Pretrial Conference (currently scheduled for November 17) and associated deadlines to dates in January.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Kenneth R. Schachter  
Kenneth R. Schachter

cc: All counsel of record

*Time to answer extended  
to December 13, 2023.  
Conference adjourned for  
November 17 to  
January 18, 2024 at 11:30am  
telephone call.  
SO ORDERED  
[Signature]  
USDJ  
11-14-23*