

Via ECF

July 3, 2024

Hon. Edgarmo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED at 2.

In re: *Goldman v. Weisman*
Case No.: 1:23-cv-09602-ER

Dear Hon. Edgarmo Ramos:

This office represents the Plaintiff in the above-referenced matter. The purpose of this letter is to formally request for an extension of time to oppose Defendant's Motion to Dismiss, responsive to the Order filed by this Court on June 27, 2024.

As an initial matter, my office has greatly appreciated this Court's patience and understanding with respect to our recent office relocation and accompanying technical difficulties pursuant to resetting the initial deadline to respond to Defendant's Motion to Dismiss. However, while briefing Defendant's motion—authored by *two attorneys* with voluminous and nuanced case law contained therein—my office has come to the conclusion that additional time is necessary to properly respond to Defendant's Motion.

Given my schedule I require until the 15th of July, 2024 to submit the reply to the motion to dismiss. This is *not* an intentional delay. Given the importance of this reply, my client deserves the best possible legal service.

As this Court is well aware, “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6.

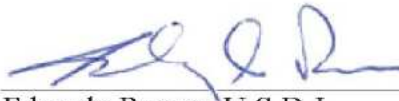
Once again, I sincerely apologize for any delays, both to my colleagues and especially to this Court. However, in the interest of justice and equity, given the nature of this claim and the nuances contained therein, an extension of time will allow for my office to fully oppose this motion pursuant to moving this action forward.

Respectfully submitted,

/s/ Victor M. Feraru
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cc: All Parties via ECF

Plaintiff's request for an extension until July 15, 2024, is hereby granted. No further extensions will be granted, except for good cause shown. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 07/03/2024

New York, New York