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Uniondale, New York 11553 T: 516-203-7600 F: 516-282-7878

February 6, 2024

Via ECF

Hon. Robyn F. Tarnofsky U.S. District Court, Southern District of New York 500 Pearl Street New York, New York 10007

Re: Igor Vidyashev v. Valnet, Inc.

Docket No: 1:23-cv-11210-LAK-RFT

Dear Judge Tarnofsky:

We are the attorneys for Plaintiff Igor Vidyashev ("Plaintiff") in this matter. Pursuant to Section I(E) of Your Honor's Individual Practices, we write to respectfully request an adjournment of the initial conference date until at least 14 days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant's response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties' settlement discussions.

Defendant executed a waiver of service on January 3, 2024, setting April 2, 2024 as Defendant's deadline to answer the Complaint (ECF No. 10). The initial conference is currently set for February 15, 2024. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s Renee J. Aragona Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.
Mitchell Silberberg & Knupp LLP
Via email to lre@msk.com

Counsel for Defendant

The Initial Case Management Conference scheduled for February 15, 2024 is adjourned to **April 8, 2024, 10 AM**. The conference shall not be rescheduled to any date beyond April 8, 2024 absent good cause shown. Counsel for the parties are directed to call my conference line at the scheduled time. Please dial (646) 453-4442, Access Code: 662 891 768#.

Date: 02/07/2024

New York, NY

SO ORDERED

ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE