

September 24, 2024

## **VIA ECF**

Hon. Katharine H. Parker U.S. District Court 500 Pearl Street, Room 750 New York, New York 10007

CALLY FILED
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09/24/2024

NEW YORK 400 MADISON AVE., 10<sup>TH</sup> FL NEW YORK, NEW YORK, 10017 TELEPHONE: (212)213-8844 FACSIMILE: (212)213-3318

NEW JERSEY 51 JFK Parkway Short Hills, New Jersey 07078 Telephone (973) 379-0038 Facsimile (973) 379-0048

WWW.ALLYNFORTUNA.COM

## MEMO ENDORSED

Re: Sound Around Inc. v. Friedman et al. Case No. 1:24-cv-01986-JHR-KHP

Dear Judge Parker:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC ("Defendants") in the above-referenced matter. We write to request a one-week adjournment of the initial conference scheduled before Your Honor on October 8, 2024.

The reason for the request for the adjournment is that, since September 10, 2024, when Your Honor issued the order denying Defendants' request for relief from the obligation to submit a joint discovery plan, I have been involved in a matter in the Supreme Court of the State of New York, County of Rockland, that has required my full attention and in which a hearing is scheduled to begin September 25, 2024. As a result, I have not had the opportunity to work with my clients to prepare their portion of the joint discovery plan, which will involve the defenses and counterclaims to the Complaint which they will pursue if this matter is not disposed of on Defendants' motion to dismiss.

Counsel for Plaintiff has declined to consent to this request. Counsel for Co-Defendants Executive Services and Executive Laundry have consented to this request. Thank you for your consideration.

APPLICATION GRANTED: Initial Conference set for 10/8/2024 at 10:00 AM in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to Wednesday, November 6, 2024 at 2: 45 p.m.

Sincerely,

/s/Nicholas Fortuna

Nicholas Fortuna

APPLICATION GRANTED

Hon, Katharine H. Parker, U.S.M.J.

09/24/2024