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March 25, 2024

## VIA ECF

Honorable Ronnie Abrams United States District Court, S.D.N.Y. 40 Foley Square New York, NY 10007

Thomas J. Wilkinson v. State Farm Fire and Casualty Company

Index No. 24-cv-2032 (RA)

## Dear Judge Abrams:

Re:

This Firm represents Defendant, State Farm Fire and Casualty Company ("State Farm"), in the above referenced action. In accordance with Your Honor's Individual Rules & Practices, Rule 1.D., State Farm respectfully requests an extension of time to respond to Plaintiff's Complaint up to and including April 24, 2024. This matter was removed to federal court on March 19, 2024, and the current due date to respond is March 26, 2024. State Farm intends to make a motion to dismiss the complaint and seeks an extension of time to adequately prepare its motion. Plaintiff's counsel consents to this request. This is State Farm's first request for an extension of time to respond to the complaint.

We thank you for your attention to this matter and appreciate the Court's courtesies in this regard.

Application granted. SO ORDERED.

Very truly yours,

RIVKIN RADLER LLP

Michael P. Welch

Michael P. Welch

Hon. Ronnie Abrams U.S. District Court

March 26, 2024

cc: All counsel via ECF

4887-8332-2288, v. 1