

1330 AVE. OF THE AMERICAS 32ND FLOOR NEW YORK, NY 10019 www.bursor.com MAX S. ROBERTS
Tel: 646.837.7408
Fax: 212.989.9163
mroberts@bursor.com

June 3, 2024

Via ECF

The Honorable Paul A. Engelmayer Thurgood Marshall United States Courthouse 40 Foley Square, Room 2201 New York, NY 10007

Re: Xu v. Reuters News & Media, Inc., Case No. 1:24-cv-02466-PAE

Dear Judge Engelmayer:

I represent Zhizhi Xu ("Plaintiff") in the above matter. Pursuant to Rule I.E of the Court's Individual Rules, I write jointly on behalf of Plaintiff and Defendant Reuters News & Media Inc. ("Defendant") to request an extension of the briefing schedule on Defendant's Motion to Dismiss set forth in the Court's June 3, 2024 Order (ECF No. 13).

Good cause exists to grant this extension. On June 3, 2024, the Court entered an Order requiring (i) Plaintiff to file an amended complaint by June 14, 2024, and (ii) if Plaintiff does not amend, for her to file her Opposition to the Motion to Dismiss by June 14, 2024, and for Defendant to file its Reply to the Motion to Dismiss by June 21, 2024. ECF No. 13. The Parties require additional time to prepare the potential amended complaint or their respective briefs. Specifically, Plaintiff's counsel has conflicts in other matters and Defendant's counsel likewise has conflicts the week of June 17, 2024. Accordingly, the Parties request an extension of the briefing schedule, as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Plaintiff's Amended Complaint or Opposition to Motion to Dismiss	June 14, 2024	June 21, 2024
Defendant's Reply in Support of Motion to Dismiss or	June 21, 2024 (if Plaintiff files an Opposition)	July 8, 2024 (if Plaintiff files an Opposition)
Response to Amended Complaint	July 8, 2024 (if Plaintiff files an Amended Complaint)	July 15, 2024 (if Plaintiff files an Amended Complaint)

Defendant previously requested an extension of the deadline for it to respond to Plaintiff's Complaint, which was granted. ECF No. 7.

Respectfully submitted,

Max S. Roberts

Attorney for Plaintiff

CC: All Counsel of Record (via ECF)

GRANTED. SO ORDERED.

Dated: June 4, 2024 PAUL A. ENGELMAYER United States District Judge

Paul A. Engloyer