



CORINNE S. ROCKOFF
CROCKOFF@MADDINHAUSER.COM
248.827.1881 Direct
248.827.1882 FAX

One Towne Square | Fifth Floor | Southfield, MI 48076 | (248) 354-4030 | fax (248) 354-1422 | www.maddinhauser.com

November 21, 2024

SENT VIA ECF

Hon. Jennifer L. Rochon, United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007-1312

Re: CG Access Group, LLC v. Fabrique Innovations, Inc., d/b/a/ Bitty Boomers
Southern District of New York, Case No. 1:24-cv-3230
Joint Letter Motion for Adjournment of and Zoom Appearance at Initial Pretrial
Conference

Dear Judge Rochon,

We write on behalf of Plaintiff CG Access Group, LLC (“Plaintiff”) and Defendant, Fabrique Innovations, Inc., d/b/a Bitty Boomers (“Defendant” and together with Plaintiff, the “Parties”), to set forth the Parties’ joint request that the Court 1) adjourn the Initial Pretrial Conference set for December 3, 2024 at 11:00 A.M. (ECF No. 24) to the next available date thereafter which is agreeable to the Court, and 2) permit the Parties, via their counsel, to appear remotely for such Initial Pretrial Conference.

Pursuant to the Court’s Order of November 18, 2024, the Parties will submit a Proposed Civil Case Management Plan and Scheduling Order and a Joint Pretrial Letter describing the case, any contemplated motions, and the prospect for settlement at least seven days in advance of the Initial Pretrial Conference. (ECF No. 24).

The Parties request an adjournment of Initial Pretrial Conference to accommodate a previously scheduled hearing in another matter, which requires that Defendant’s counsel appear in another court on December 3, 2024 and would prevent him from timely appearing before the Court

in this matter. Further, the Parties request leave to appear remotely at this time to in an effort to avoid unnecessary expense to either party. Plaintiff's Counsel is currently in Michigan and would incur significant costs if physical attendance is ultimately required.

Accordingly, the parties respectfully request that this Honorable Court Grant this Letter Motion and 1) adjourn the Initial Pretrial Conference set for December 3, 2024 at 11:00 A.M. (ECF No. 24) to the next available date thereafter which is agreeable to the Court, and 2) permit the Parties, via their counsel, to appear remotely for the Initial Pretrial Conference on whatever such date is set by this Court.

Respectfully submitted,

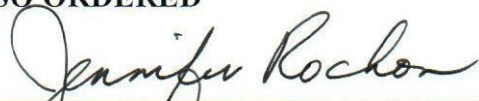
By: Corinne S. Rockoff
Corinne S. Rockoff
MADDIN, HAUSER, ROTH & HELLER, P.C.
One Towne Square – Fifth Floor
Southfield, MI 48076
248.354.4030
crockoff@maddinhauser.com
Counsel for Plaintiff

By: David K. Bowles (with permission)
David K. Bowles
BOWLES & JOHNSON PLLC
14 Wall Street, 20th Floor
New York, New York 10005
212.390.8842
David@bojo.law
Counsel for Defendant

The Court GRANTS the requested adjournment and the request to have the initial pre-trial conference held remotely. The initial pre-trial conference is rescheduled to **December 10, 2024 at 11:00 a.m.** Counsel will receive login information for Microsoft Teams at the emails listed on the docket. The public listen-only line may be accessed by dialing Toll-Free Number: 877-336-1831 | Access Code: 5583342.

Date: November 22, 2024
New York, New York

SO ORDERED



JENNIFER L. ROCHON
United States District Judge