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September 20, 2024

The conference is adjourned to November 15, 2024, at 10:00 a.m.

SO ORDERED.

VIA ECF

Hon. Alvin K. Hellerstein, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

Dated: 9/23/24
New York, New York

/s/ Alvin K. Hellerstein
ALVIN K. HELLERSTEIN
United States District Judge

Re: *Jawad Elatab v. MediaTakeOut.com LLC*,
Case No. 1:24-cv-04008-AKH

Dear Judge Hellerstein:

We represent plaintiff Jawad Elatab (“*Plaintiff*”) in the above captioned action. Pursuant to Paragraphs 1(A) and 1(D) of Your Honor’s Individual Practices, Plaintiff respectfully requests an adjournment *sine die* of the September 27, 2024, Status Conference.

In support of this Motion, Plaintiff includes the following:

- (1) The Court has scheduled a Status Conference for September 27, 2024, at 10:00 a.m. (*Dkt. No. 16*);
- (2) This is Plaintiff’s first request for an adjournment and/or extension of time and there are no further scheduled dates regarding this action;
- (3) Good cause exists for the instant request as defendant MediaTakeOut.com LLC (“*Defendant*”) has yet to enter an appearance in this action or respond to the Clerk’s issuance of a Certificate of Default (*Dkt. No. 15*);
- (4) As Defendant has yet to enter an appearance in this action, there is no party with which Plaintiff can confer regarding their consent to this request;
- (5) Plaintiff intends to move for default judgment within thirty (30) days of the date of this submission.

The instant request is made in good faith and granting the requested adjournment will not prejudice any party to this matter. Thank you for your consideration of this request.



Respectfully submitted,

/s/ Joshua D. Vera
Joshua D. Vera
Counsel for Plaintiff

cc: Counsel of Record