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January 24, 2025

## VIA ECF

Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

## **APPLICATION GRANTED SO ORDERED**

Re: Moses v. Commerce Media Holdings, LLC, 1:24-cv-04291-JGK

Dear Judge Koeltl:

We represent Plaintiff Dean Moses in the above-captioned case and write pursuant to Section I.E of the Court's Individual Practices to respectfully request a thirtyday extension of the deadline to dismiss the case (or otherwise re-open).

- 1) The original deadline is January 27, 2025; the proposed new deadline is February 26, 2025.
- 2) No previous requests for an extension of this deadline have been made;
- 3) No previous requests have been granted or denied;
- 4) Defendant consents to the requested relief;
- 5) The reason for the request is that, despite best efforts, the parties were not able to consummate the settlement transaction before the original deadline. No other dates will be impacted by this request.

Respectfully Submitted,

s/jameshfreeman/ James H. Freeman

Counsel for Plaintiff