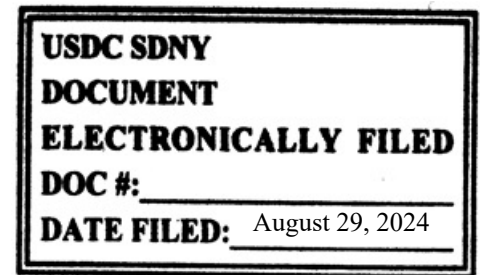




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August 28, 2024



**Via ECF**

Hon. Margaret M. Garnett  
U.S. District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *Robert Mecea v. NBCUniversal Media, LLC*  
Case No: 1:24-cv-05233

Dear Judge Garnett:

We represent plaintiff Robert Mecea ("*Plaintiff*") in the above-captioned matter and write pursuant to Rule I(B)(5) of Your Honor's Individual Rules to respectfully request an adjournment of the September 3, 2024, Initial Pre-trial Conference and the associated filing deadline(s), and a 30-day extension of time, to September 27, 2024, for defendant NBCUniversal Media, LLC ("*Defendant*"), to file its appearance and respond to the Complaint.

1. Plaintiff, via counsel, attempted to contact Defendant in the hopes of Defendant appearing in this action and in avoiding seeking entry of default against Defendant [*see text entry accompanying Dkt. No. 8*]. In response thereto, counsel for Defendant contacted Plaintiff, advising Plaintiff of their representation of Defendant.
2. In light of Defendant's recent contact, Plaintiff respectfully requests a 30-day extension of time, to September 27, 2024, for Defendant to file its appearance and respond to the Complaint, and further requests that the Initial Pre-Trial Conference, currently scheduled for September 4, 2024, at 9:30 a.m., along with the associated filing deadline(s) [Dkt. No. 7]<sup>1</sup>, be adjourned for 30 days thereafter, to October 29, 2024, or to an alternative date following the Defendant's appearance in this matter.
3. Good cause exists for the instant request as counsel for Defendant has not yet filed an appearance on this matter, and the adjournment and extension would permit the parties time to competently discuss the required topics under Rule 26(f) and the most appropriate

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<sup>1</sup> Plaintiff acknowledges that the filing deadline for the Civil Case Management Plan and Scheduling Order as well as the joint letter has past, and states that said missed deadline is the result of a clerical oversight with calendaring. Counsel apologizes for the clerical oversight and subsequent oversight of the filing deadline and respectfully submits that the Court's Orders are taken very seriously.

case management plan based on Defendant's response to the Complaint. Further, the additional time would enable the parties to discuss the possibility of early resolution.

4. This is Plaintiff's first request for an adjournment and extension of time and the request is made in good faith, not for the purposes of delay, and granting this request will not prejudice any party in this matter.

Thank you for your consideration of this request.

Respectfully submitted,

**SANDERS LAW GROUP**

*/s Jaymie Sabilia-Heffert*  
Jaymie Sabilia-Heffert

Application GRANTED. It is hereby ORDERED that Defendant shall enter an appearance and answer, move, or otherwise respond to the Complaint on or before **September 27, 2024**. It is further ORDERED that the September 3, 2024 Initial Pretrial Conference is ADJOURNED to **Tuesday, October 22, 2024 at 9:30 a.m.** in Courtroom 906 of the Thurgood Marshall Courthouse, New York, NY 10007. The parties are further ORDERED to file on ECF a joint letter, as well as a proposed Civil Case Management Plan and Scheduling Order attached as an exhibit to the joint letter, no later than **October 15, 2024**. The parties shall use this Court's form proposed Civil Case Management Plan and Scheduling Order, which is available at <https://nysd.uscourts.gov/hon-margaret-m-garnett>.

As Defendant has not yet entered an appearance, Plaintiff is directed to (1) to notify counsel for Defendant by serving upon them a copy of this Order and the Court's Individual Rules forthwith within three business days of the date of this Order (which service may occur electronically), and (2) to file proof of such notice with the Court within two business days of service.

The Clerk of Court is respectfully directed to terminate Dkt. No. 10.

SO ORDERED. Dated August 29, 2024.

  
HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE