



Sylvia E. Simson  
Tel 212.801.9200  
Sylvia.Simson@gtlaw.com

October 1, 2024

**BY ECF**

Honorable Jennifer H. Rearden  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1010  
New York, New York 10007

Re: *In re Carol Ramos-Meza*, No. 24-CV-06593 (JHR) — Joint Request for Extension of Briefing Schedule

Dear Judge Rearden:

We represent Defendant-Appellee JPMorgan Chase Bank, N.A. (“Chase”) in the above-referenced matter (the “Appeal”) and write to request approval of an agreed-upon briefing schedule for Plaintiff-Appellant’s appeal of an order by Judge Lisa G. Beckerman of the U.S. Bankruptcy Court for the Southern District of New York in Adv. Pro. No. 24-01332 (LGB) (the “Adversary Proceeding”) granting Chase’s motion to dismiss Plaintiff-Appellant’s complaint and dismissing the action in its entirety with prejudice.

Currently, the parties’ respective motions with respect to whether the Appeal should be dismissed, *see* Doc. Nos. 3, 4, 6-9, remain pending. Subject to its pending motion and position that the Appeal should be dismissed, Chase submitted its additional designation of items to be included in the record on appeal pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure, and on Thursday, September 26, 2024, the Notice of Record of Appeal Availability was docketed at Doc. No. 11 on the Appeal docket. That same docket entry notified the parties that Appellant’s brief is due by Monday, October 28, 2024. *Id.* The parties have conferred regarding the current timeline for filing the Appellant brief and Appellee brief and respectfully and jointly request that the Court instead set the following briefing schedule:

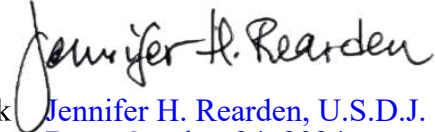
<u>EVENT</u>	<u>DATE</u>
Appellant’s Brief	Friday, November 15, 2024
Appellee’s Brief	Friday, January 17, 2025
Appellant’s Reply	Friday, January 31, 2025

This is the first request by any party for an extension of briefing deadlines in the Appeal. We make this joint request to accommodate certain work conflicts of counsel, including trial preparation for another matter, and further to avoid filing deadlines immediately following the Thanksgiving and Christmas holidays. Additionally, the revised proposed briefing schedule provides Your Honor with adequate time to address the pending motions concerning whether this Appeal should be dismissed. The schedule proposed above was jointly agreed upon by both Chase and the Plaintiff-Appellant and will allow the parties to properly brief the issues for the Court.

Application GRANTED.

The Clerk of Court is directed to terminate ECF No. 12.

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Date: October 24, 2024

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We appreciate the Court's attention to this matter and are available should the Court have any questions.

Respectfully submitted,

*/s/ Sylvia E. Simson*

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