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March 10, 2025

**VIA ECF**

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street  
New York, New York 10007

Re: *Jillian Lugo v. Bowery Residents' Committee, Inc.*  
Docket No. 24-cv-07223 (JMF)

Dear Judge Furman:

This firm represents Plaintiff Jillian Lugo in this matter against Defendant Bowery Residents' Committee, Inc. for alleged violations of the Fair Labor Standards Act and New York Labor Law. The parties participated in a mediation on February 28, 2025 during which the parties reached a settlement in principle. Thereafter, the Court entered an order directing the parties to submit a motion for approval of the parties' settlement, pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015), by March 11, 2025. The parties are currently engaged in negotiating the terms of their formal settlement agreement. However, the parties require additional time to finalize their formal settlement agreement and obtain the parties' signatures for their agreement. Accordingly, Plaintiff requests, with Defendant's consent, that the time for Plaintiff to submit her motion for approval be extended from March 11, 2025 until March 31, 2025. This is Plaintiff's first request for the relief sought.

Plaintiff thanks the Court for its kind consideration of this request.

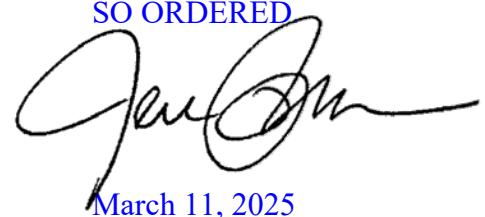
Respectfully submitted,

/S/ David D. Barnhorn, Esq.  
DAVID D. BARNHORN, ESQ.

C: All Counsel of Record

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 23.

SO ORDERED



March 11, 2025