



**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY 10165  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/6/2025

**MEMORANDUM ENDORSED**

March 5, 2025

**VIA ECF**

Hon. Gregory H. Woods  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Loewe, S.A. v. Beijing Onward Fashion Co., Ltd., et al.***  
**Case No. 24-cv-8871 (GHW)**  
**Second Request to Modify Airwallex's Motion Briefing Schedule**

Dear Judge Woods,

We represent Plaintiff Loewe, S.A. ("Plaintiff"), in the above-referenced matter (the "Action").<sup>1</sup> On February 5, 2025, Financial Institution Airwallex Hong Kong Limited ("Airwallex") filed a Motion for Fees and Costs ("Airwallex Motion") (Dkts. 32-35). Thereafter, by Order dated February 10, 2025, the Court set forth a briefing schedule for Airwallex's Motion. (Dkt. 37). Thereafter, on February 14, 2025, Plaintiff filed a letter requesting to extend the dates in the Court's briefing schedule for Airwallex's Motion, which the Court granted by order. (Dkts. 39-40).

Since filing the February 14, 2025 letter, counsel for Plaintiff and counsel for Airwallex have made meaningful progress in reaching an amicable resolution without the need for further judicial intervention but require additional time to finalize our discussions. Accordingly, Plaintiff respectfully requests that the Court modify the briefing schedule on Airwallex's Motion, and in accordance with Your Honor's Individual Rules of Practice, respectfully submits the following:

1. **Current due date:** Plaintiff's deadline to file its opposition to the Airwallex Motion is March 7, 2025. Airwallex's deadline to file its reply, if any, is within seven (7) days of Plaintiff's opposition.
2. **The number of previous requests for extension:** This is Plaintiff and Airwallex's second request for an extension of the briefing schedule for Airwallex's Motion.
3. **The reason for the current request:** Plaintiff's counsel and Airwallex's counsel are engaging in productive discussions and have made meaningful progress in amicably resolving the issues set forth in Airwallex's Motion. Accordingly, Plaintiff and Airwallex respectfully request an

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff's Complaint.

extension of time to finalize such discussions and avoid wasting the Court's time and judicial resources.

4. **Whether the adversary consents:** Airwallex consents to Plaintiff's instant request.
5. **Proposed alternative dates:** Plaintiff and Airwallex propose extending the deadlines by two (2) weeks, *i.e.*, making Plaintiff's deadline to file its opposition is March 21, 2025 and Airwallex's deadline to file its response is within seven (7) days of Plaintiff's opposition.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY 4228)  
dfutterman@ipcounselors.com  
60 East 42nd Street, Suite 1250  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiff*

Application granted. Plaintiff's application for an extension of time to file its opposition to the motion for fees and costs filed by Airwallex Hong Kong Limited ("Airwallex"), Dkt. No. 41, is granted. Plaintiff's opposition is due no later than March 21, 2025; AirWallex's reply, if any, is due within seven days after service of Plaintiff's opposition. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 41.

SO ORDERED.

Dated: March 6, 2025  
New York, New York

  
GREGORY H. WOODS  
United States District Judge