

HANSKI PARTNERS LLC

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March 10, 2025

Via ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

If defendants' time to answer has expired without any appearance, plaintiff should follow the appropriate procedures to obtain a default judgment. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 10.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: March 11, 2025

Re: Letter Motion to Adjourn Initial Pretrial Conference and Pre-Conference Filings
Matildelis Medina v. 217 Bowery Realty Corp. et al; 1:24-Civ-09491 (AS)

Dear Judge Subramanian:

We represent plaintiff Matildelis Medina in the above-entitled action. Pursuant to Your Honor's December 17, 2024 Order, Dkt. No. 6, an Initial Pretrial Conference is set for March 18, 2025. We write to respectfully ask the Court to adjourn the initial pretrial conference to a date convenient for the Court, on or after April 17, 2025, because the defendants have not appeared in this action yet.

Plaintiff makes this request because although defendants 217 Bowery Realty Corp., House of Bowery Corp.¹ and PAMDH Enterprises Inc. (together "Defendants") have yet to appear and defend themselves in this action, she makes a final attempt to have them appear. For the same reason Plaintiff also respectfully requests that the Court adjourn the deadline for the parties to file their proposed scheduling order and joint letter by a corresponding number of days.

With respect to Plaintiff's prior attempts, Plaintiff effectuated service on Defendants via the Secretary of State, on December 30, 2024², and Defendants' time to Answer expired on January 21, 2025. As Plaintiff is trying other means to obtain an appearance by the Defendants, Plaintiff respectfully asks that the Court adjourn both the conference and the deadline to file joint preconference submissions by a least thirty (30) days, to April 17, 2025 or a date thereafter convenient for the Court

Thank you for your consideration of this application. With kindest regards, I am

very truly yours,

/s/

Robert G. Hanski, Esq.

¹ On March 6, 2025 the undersigned was contacted by Ahmed A. Massoud, Esq. of Massoud & Pashkoff LLP who claimed that his "firm is being retained to represent House of Bowery Corp....". However, House of Bowery Corp. still has not appeared in this action nor responded to multiple follow up inquires (both email and telephonic) by the undersigned.

² Plaintiff filed the affidavits of service on March 10, 2025 (ECF Nos. 7 through 9).