



February 24, 2021

**VIA ECF**

Hon. Phillip M. Halpern  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Application granted. In compliance with the Court's Rules, Defendants shall file their pre-motion conference letter as well as a single document representing their Rule 56.1 Statement and the opposing party's responses thereto by April 19, 2021. Plaintiffs shall file their opposition letter by April 26, 2021. The Court shall hold a pre-motion conference on April 29, 2021 at 10:00 a.m. At the time of the scheduled conference all parties shall call (888) 398-2342; access code: 3456831. The Clerk is directed to terminate ECF No. 121.

SO ORDERED.

  
Philip M. Halpern, U.S.D.J.

Dated: White Plains, NY  
February 25, 2021

Re: *Emanuel v. Gap, Inc., et al.*  
Case No.: 19-cv-03617-PMH-AEK

Dear Judge Halpern:

We represent Defendants Gap, Inc., Banana Republic, LLC, Michelle Russo, Toni Lynn Borowski and Gregoire Jean-Louis (collectively "Defendants") in connection with the above-referenced matter.

Defendants intend to file a motion for summary judgment in this matter. Pursuant to Judge Smith's Case Management Order (Dkt. 101), the pre-motion letter is currently due March 5, 2021.

Pursuant to Rules 1(C) and (E)(vii) of your Honor's individual rules, we write to request an extension of time for Defendants to submit their pre-motion letter to April 19, 2021. The extension is necessary to provide sufficient time for the Parties to prepare the required 56.1 Statement and responses. Plaintiffs consent to this request.

We further write to request an adjournment of the telephonic conference scheduled before Your Honor on March 24, 2021 at 10:00am to a date after April 26, which will be after Defendants' submission of their pre-motion letter and Plaintiffs' response to the letter. Plaintiffs consent to this request.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Jean L. Schmidt

Jean L. Schmidt  
cc: Parris G. Filippatos, Esq.