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## MEMO ENDORSED

### VIA ECF

The Honorable Jessica G.L. Clarke  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl St.  
 New York, NY 10007-1312

April 21, 2025

Application GRANTED. Parties to file joint letter by May 5, 2025. The Clerk of Court is directed to terminate ECF No. 27.

SO ORDERED.

JESSICA G. L. CLARKE  
 United States District Judge  
 Dated: April 22, 2025

New York, New York

Re: *R&J Food Corp., et al. v. United States of America*  
Civil Action No.: 7:24-cv-08034 (JGLC)

Dear Judge Clarke:

This office represents the Plaintiffs, R & J Food Corp., a New York Corporation, Kelvi Infante, an Individual, and Johnny Almonte, an Individual (the “Plaintiffs”) in the above-referenced action. The Plaintiffs seeks review of a Final Agency Decision temporarily disqualifying them for six-months from participating in the Supplemental Nutritional Assistance Program (“SNAP”). ECF No. 1. The parties are currently required to file a joint letter as directed by the Court in its Order dated April 2, 2025 (ECF No. 26). I write to respectfully request an extension of time of two (2) weeks – from April 21, 2025 to May 5, 2025, to file the joint letter.

The extension is respectfully requested as the undersigned counsel’s office received a call from the newly assigned Assistant U.S. Attorney, Leslie Ramirez-Fisher, on Friday morning, April 18, 2025 introducing herself. At that time, she advised that she was reaching out to obtain Plaintiffs’ consent for a two (2) week extension on the parties’ joint letter to the Court in order to allow her time to get familiarized with the case and also to allow time for her to confer with the undersigned the week of April 21, 2025 – April 25, 2025. The undersigned counsel consented to Defendant’s requested two (2) week extension via email along with a telephone call advising the Plaintiffs’ consent. The parties’ counsels have not yet conferred about the case and the discovery issues pending before the Court since Attorney Ramirez-Fisher’s assignment. The Plaintiffs believe that the requested extension will lead to a more productive initial pretrial conference and a more economical use of the Court’s time and resources.

As of the time of filing, Attorney Ramirez-Fisher has not yet filed her request with the Court, though the undersigned changed his work load over the weekend in reliance upon her request. Accordingly, the Plaintiffs submit this request in good faith and in furtherance of the discussions that were had on April 18th, and so as to avoid missing the Court’s present deadline of today, April 21st.

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Accordingly, the Plaintiffs respectfully request the Court extend the parties' deadline to file a joint letter to a date on or after May 5, 2025. I thank the Court for its consideration of this submission.

Respectfully submitted,

**METROPOLITAN LAW GROUP, PLLC**

/s/ Andrew Z. Tapp

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AZT/lcd

cc: Leslie Ramirez-Fisher, Esq. (by CM/ECF)  
Joseph A. Pantoja, Esq. (by CM/ECF)