



R E V I S I O N / L E G A L

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August 28, 2018

VIA ECF

United States Magistrate Judge Pitman
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

RE: Plaintiff's Third Request for Extension of Deadlines
BMaddox Enterprises LLC v. Milad Oskouie, et al., 17-cv-1889-RA-HBP

Dear Magistrate Judge Pitman:

In part because Plaintiff's pending motions may be dispositive, Plaintiff hereby requests an extension of the current deadline for dispositive motions, which is **Monday, July 3, 2018**.

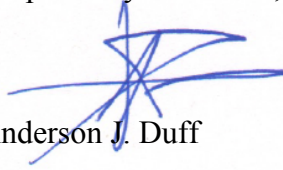
Plaintiff is prepared to submit a fully briefed motion for summary judgment on or before the current deadline, but its ability to do so has been curtailed by Defendant's failure to participate in the discovery process. The motions currently pending before the Court may narrow the scope of or make redundant Plaintiff's contemplated motion for summary judgment. For the foregoing reasons, Plaintiff requests extension of the July 3, 2018 deadline and all subsequent deadlines by two months or such other time as the Court sees fit.

If the Court grants Plaintiff's requested two-month extension, the new deadline for dispositive motions would be **Friday, November 2, 2018**. The current deadline for the Pretrial Order, **July 31, 2018**, would likewise be extended to **Friday, November 30, 2018**.

This is Plaintiff's third request for extension of these deadlines. Plaintiff's first and second requests were granted by the Court. Defendants have not consented to Plaintiff's request for an extension because Defendants' counsel stated in an August 29, 2018 email that he is unable to contact his client. (Ex. A.) The original deadline for dispositive motions was April 30, 2018. (Scheduling Order 5, ECF No. 66.) The Court amended this deadline with two revised scheduling orders on April 25, 2018 and June 28, 2018. (ECF No. 146; ECF No. 165.)

Because Plaintiff's requested extension would affect the current deadline for the Pretrial Order, a Proposed Revised Scheduling Order is attached.

Respectfully submitted,



Anderson J. Duff

AJD/rr
Encl.