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September 19, 2017

By ECF

Magistrate Judge Pitman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

BMaddox Enterprises v. Oskouie, et al., No. 17-CV-1889 (RA)(HBP)

Dear Magistrate Judge Pitman:

I am counsel for Defendants in the above-referenced action. I write pursuant to Your Honor's Individual Practices 1(E) to request a three-week extension of time to respond to Counterdefendants' Motion for Rule 11 Sanctions (ECF No. 56) from September 21, 2017 until October 12, 2017. This is Defendants' first request for an extension of time.

The purpose of the extension is to provide a fuller review and response to the Rule 11 motion, which targets (1) all of Defendants' counterclaims, (2) Defendants' opposition to Plaintiff's preliminary injunction motion, and (3) Defendants' application for a temporary restraining order.

Furthermore, Counterdefendants have stated an intention to file a motion to dismiss Defendants' counterclaims in previous requests for extensions of time from Your Honor. Counterdefendants' answer or motion is now due September 27, 2017. Defendants' responses to the Rule 11 motion and their opposition to the expected motion to dismiss the counterclaims will be largely similar. The requested extension would therefore harmonize the response deadlines for Defendants' oppositions to Counterdefendants' motions which seek effectively the same relief.

The undersigned has conferred with Anderson J. Duff, Esq., counsel for Plaintiff and Counterdefendants regarding the requested extension. Counsel did not consent to Defendants' request, but did not offer any reasons for withholding such consent.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. Lin", with a long horizontal flourish extending to the right.

David D. Lin

cc: Anderson J. Duff, Esq. (by ECF)