

Counseling and Advising Clients Exclusively on Laws of the Workplace



Zabell & Associates, P.C.  
1 Corporate Drive  
Suite 103  
Bohemia, New York 11716  
Tel. 631-589-7242  
Fax. 631-563-7475  
www.Laborlawsny.com

**Saul D. Zabell**  
Email: SZabell@laborlawsny.com

April 15, 2013

**VIA ECF**

The Honorable Joseph F. Bianco  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re: Zarda v. Altitude Express, Inc., et al.**  
**Case No.: CV-10-4334 (JFB)(ARL)**

Your Honor:

This firm represents Defendants in the above-captioned matter. We write, with Plaintiff's consent, to respectfully request a nine (9) day extension of time to file Defendants' reply and opposition to Plaintiff's cross-motion for summary judgment. In light of Plaintiff's additional submissions to Your Honor on April 12, 2013, documentation which Defendants received for the first time in this morning's mail, Defendants will require additional time to generate a response. Therefore, we respectfully request the deadline for Defendants' submission be extended to May 3, 2013, and Plaintiff's reply be correspondingly extended to May 24, 2013.

We thank the court for its consideration of this application and remain available should additional information be required.

Respectfully submitted,

**ZABELL & ASSOCIATES, P.C.**



Saul D. Zabell

Sdz/arg

cc: Gregory Antollino, Esq. (via ECF)  
Client