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March 31, 2016

VIA ECF and FAX 212-805-6737

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street, Room 1310
New York, N.Y. 10007

Re: Cargian v. Breitling USA, Inc.
15 Cv 01084

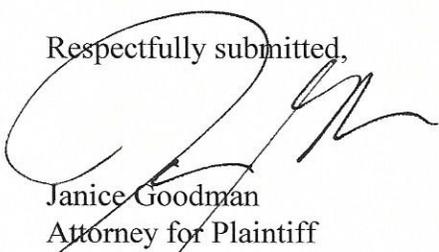
Dear Judge Daniels:

I respond to Defendant's letter request for additional time to reply to Plaintiff's Opposition to its Summary Judgment Motion.

It is not true that there were substantive changes to Plaintiff's Corrected Brief. The changes were to correct misspelling, lack of identification of certain witnesses, and missing cites. Moreover there is disagreement over whether the ECF problems delayed defendant from receiving the documents in a timely fashion.

Nonetheless, had defendant done me the courtesy of waiting to consult with me before writing to you, I would have told him, as I tell you, I have no objection to the additional time.

Respectfully submitted,


Janice Goodman
Attorney for Plaintiff

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