



Fox Rothschild LLP
ATTORNEYS AT LAW

100 Park Avenue, Suite 1500
New York, NY 10017
Tel 212.878.7900 Fax 212.692.0940
www.foxrothschild.com

Zev Singer
Direct Dial: (212) 878-7928
Email Address: zsinger@foxrothschild.com

VIA ECF AND FAX- 212-805-6737

Hon. George B. Daniels
United States District Judge
Southern District of New York

April 11, 2016

**Re: Cargian v. Breitling USA, Inc.
Civil Action No.: 15-cv-01084**

Your Honor:

We represent defendant Breitling USA, Inc. (“Defendant”) in the above-referenced matter. We write pursuant to the Court’s rules to respectfully request oral argument in connection with Defendant’s motion for summary judgement, filed and served on February 29, 2016. The current deadline for Defendant’s reply papers is April 18, 2016. Plaintiff’s counsel’s position is that she does not join in this request and does not see a need for oral argument on this motion.

In addition, there is a status conference in this matter currently scheduled for April 26, 2016. Last week, I discussed the status conference with Plaintiff’s counsel and sought her consent to adjourn the conference due to the fact that there is a motion pending and discovery is closed in this matter. Counsel informed me that she does not consent to adjourning that conference because her position is that if the Court grants Defendant’s application for oral argument on the summary judgment motion, she would like to have the oral argument on that day, April 26th. Defendant respectfully requests that the conference (or oral argument) be adjourned to a later date, as the 26th falls in the midst of the Passover holiday and due to travel schedules and time out of the office, it will be particularly difficult to appear for oral argument on that day. Defendant’s counsel are available for oral argument on any date in May and for most of June. We thank the Court for its consideration of this request.

Respectfully submitted,
FOX ROTHSCHILD LLP

Zev Singer

CC: All Attorneys of Record (via ECF)
Janice Goodman, Esq., via email