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April 21, 2020

BY ECF

Honorable Laura Taylor Swain  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Sucesores de Don Carlos Nuñez y Doña Pura Galvez, Inc. v. Société Générale S.A.*, et al., No. 20-cv-851-LTS-KNF

Dear Judge Swain,

We represent *Sucesores de Don Carlos Nuñez y Doña Pura Galvez, Inc.* (“*Sucesores*”) in the above-captioned matter. On April 3, 2020, *Sucesores* filed a letter informing the Court that it intended to amend its complaint and had begun the process of conferring with the relevant party, Defendant *Société Générale, S.A.* (“*SG*”). *Sucesores* stated its intent either to file a second amended complaint or to move for leave to file a second amended complaint by April 24, 2020. We write with an update concerning that matter.

Although *Sucesores* had anticipated filing a second amended complaint or motion to amend by April 24, 2020, *Sucesores* requires additional time to do so. *Sucesores* has conferred with counsel for *SG* about the matter. The parties have agreed that *Sucesores* will provide a copy of its proposed second amended complaint to *SG*. *Sucesores* will then file a motion for leave to amend 21 days after providing its proposed second amended complaint to *SG*.

The parties have conferred about a briefing schedule as well. Subject to the Court’s approval, they have agreed that, in the event that the Court grants *Sucesores*’s motion to amend the complaint and the second amended complaint becomes the operative pleading, *SG* will have 45 days to file a motion to dismiss *Sucesores*’s second amended complaint. *Sucesores* will then

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have 45 days to oppose SG's motion to dismiss, and SG will have 30 days to reply.

Sincerely,

/s/ Steven Molo  
Steven F. Molo

Cc: Honorable Kevin Nathaniel Fox  
All counsel of record by ECF