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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

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