



**NAPOLI
SHKOLNIK PLLC**
ATTORNEYS AT LAW

July 14, 2020

VIA ECF

Honorable Vince Chhabria
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Ponderosa Twins Plus One et al v. iHeartMedia, Inc., et al.*
Civil Case No.: 2016-cv-05648

Dear Judge Chhabria:

Our firm represents the Plaintiff and submits this letter to respectfully request additional time to file the amended complaint. Currently, the Court has ordered Plaintiff to file his amended complaint by July 17, 2020. Plaintiff has been in serious settlement discussions with certain Defendants that may obviate the need to file an amended complaint against some, or all, Defendants. Plaintiff respectfully requests 21 additional days to continue settlement discussions and file his amended complaint, if necessary, on or before August 7, 2020. If Plaintiff files an amended complaint, Defendants' motion would be due on or before August 31, 2020. Plaintiff sought consent from Defendants but did not receive a response. No other deadlines will be affected. This is Plaintiff's first request for additional time to file his amended complaint.

Respectfully submitted,

/s/ Salvatore C. Badala

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on July 14, 2020, he electronically filed a copy of the attached via the CM/ECF filing system, which sent notification of such filing to all Filing Users.

/s/ Salvatore C. Badala