MEMO ENDORSED

WUERSCH & GERING

Maria Luisa Palmese | Partner

E-mail maria.palmese@wg-law.com Direct 212-509-4744

March 10, 2020

The application is granted. The conference currently scheduled for March 13, 2020 is adjourned to April 15 at 10:30 A.M.

Edgardo Ramos, U.S.D.J Dated: March 12, 2020 New York, New York

VIA ECF

The Honorable Edgardo Ramos United States District Court for the Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Signify North America Corp., et al. v. Reggiani Lighting USA, Inc., et al., Civil Action No. 1:18-cv-11098-ER

Dear Judge Ramos:

We write on behalf of Defendants Reggiani Lighting USA, Inc., and Reggiani S.p.A. Illuminazione ("Reggiani") to request a continuance of the March 13 status conference set by the Court following Signify's letter dated March 5, 2020 (ECF No. 46).

Reggiani is a small family-owned company whose headquarters and manufacturing facilities are located outside Milan, Italy, in the Lombardy region of Italy that has been a red zone and the center of the COVID-19 coronavirus crisis in Italy since mid-February. As of yesterday, that region, which by then recorded 5469 coronavirus cases and 333 deaths, and all of Italy, which now counts over 10,000 cases and 600 deaths, is on lockdown until at least April 3, 2020. Reggiani's resources and personnel are strained by these emergency circumstances and substantive discussions regarding this case are difficult if not impossible to timely organize and are an unnecessary additional burden at this critical time. Further, Reggiani's counsel is a small firm with offices only in New York City, and based on the ongoing developments in the news expects some disruption in order to organize to work remotely.

Reggiani thus requests a continuance of the telephonic status conference for at least thirty days until at least April 14, 2020. Counsel for the parties have conferred and Signify does not oppose such a continuance.

Respectfully submitted,

USDC SDNY DOCUMENT

/s/ Maria Luisa Palmese Maria Luisa Palmese ELECTRONICALLY FILED DOC#

DATE FILED: March 12, 2020

cc: Counsel of Record (via ECF)