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December 24, 2025

*By ECF*

Hon. Nelson S. Román  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

**Re: Appearance for Additional Defendant and Request for Pre-Motion Conference**

*Gomes De Souza v. Watchtower Bible and Tract Society of Pennsylvania, Inc. et al*  
Case No.: 7:25-cv-09458-NSR

Dear Judge Román,

Our firm has already appeared on behalf of defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”). Our firm has additionally been retained by, and now appears on behalf of, the remaining defendant in the above-referenced action, Watchtower Bible and Tract Society of Pennsylvania, Inc. (“WTPA”).

Pursuant to Sections 3(A)(ii) and 3(F) of Your Honor’s Individual Practice Rules, WTPA hereby requests a pre-motion conference for an anticipated Motion to Dismiss the complaint pursuant to Fed. R. Civ. P. 12(b). The basis for WTPA’s anticipated motion is the same as we previously articulated on behalf of WTNY, that (1) the action is time-barred and (2) New York is an inconvenient forum for the adjudication of Plaintiff’s claims. For brevity, we respectfully incorporate WTNY’s arguments set forth in our December 11, 2025 letter into this letter application on behalf of WTPA, *see* ECF Dkt. No. 21.

In the interest of economy, since Plaintiff has already responded to WTNY’s pre-motion letter, *see* ECF Dkt. No. 28, and since WTPA’s arguments are identical to those previously articulated on behalf of WTNY, we would consent to Your Honor waiving any further responsive letter by Plaintiff. However, on behalf of both WTNY and WTPA we request an opportunity to be heard at a pre-motion conference regarding the contemplated motions to dismiss.

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We look forward to discussing these matters with the Court and other parties at a pre-motion conference with Your Honor.

Respectfully submitted,

FEINBERG & GASBARRO, LLP



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Glen Feinberg, Esq.

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Society of Pennsylvania, Inc. and  
Watchtower Bible and Tract Society of New  
York, Inc.*

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