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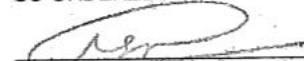
By ECF

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

In light of Defendant Watchtower Bible and Tract Society of Pennsylvania, Inc.'s ("WTPA") basis for its anticipated motion being the same as those previously articulated on behalf of Defendant Bible and Tract Society of New York, Inc. in their pre-motion letter (at ECF No. 21) and in light of Plaintiff already having responded to said letter (at ECF No. 28), the Court finds no reason to direct Plaintiff to respond again to the same proposed arguments put forth by WTPA in this letter. The Court waives any pre-motion requirements and directs the parties to follow the same briefing schedule set at ECF No. 29 for WTPA's motion to dismiss. The Clerk of Court is kindly directed to terminate the motion at ECF No. 31.

SO ORDERED:

Dated: December 29, 2025
White Plains, New York


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

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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MEMO ENDORSED

Hon. Nelson S. Román
December 24, 2025
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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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