

MCLAUGHLIN & STERN, LLP
FOUNDED 1898

JASON S. GIAIMO
Partner
jgiaimo@mclaughlinstern.com
(212) 448-1100

260 MADISON AVENUE
NEW YORK, NEW YORK 10016
(212) 448-1100
FAX (212) 448-0066
www.mclaughlinstern.com

GARDEN CITY, NY
MILLBROOK, NY
NAPLES, FL
SARASOTA, FL
WEST PALM BEACH, FL
WESTFIELD, NJ
WESTPORT, CT

January 22, 2026

VIA ECF

The Honorable Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Stella Cristina Gomes de Sousa v.*
Watchtower Bible and Tract Society of Pennsylvania, Inc., et al.
Case No.: 7-25-cv-09458-NSR

Dear Judge Román:

We represent Plaintiff Stella Cristina Gomes de Souza (“Plaintiff”) in the above-captioned matter. On January 21, 2026, Defendant Governing Body of Jehovah’s Witnesses (the “Governing Body”) served Plaintiff with its motion to dismiss Plaintiff’s Complaint. That same day, Defendants Watchtower Bible and Tract Society of Pennsylvania, Inc. (“WTPA”) and Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) also served Plaintiff with their combined motion to dismiss Plaintiff’s Complaint. For the sake of brevity and to conserve judicial resources, Plaintiff intends to oppose the motions to dismiss of the Governing Body, WTPA, and WTNY in a single submission.

Accordingly, we write pursuant to Rule 3(B) of Your Honor’s Individual Practice Rules to respectfully request that Plaintiff be permitted to submit a memorandum of law in opposition to Defendants’ motions to dismiss not exceeding 33 pages, which is equal to the total pagination of the motions to dismiss of the Governing Body and WTPA and WTNY. Plaintiff respectfully submits that this request is eminently fair and reasonable, as Plaintiff is only asking for the same page limit collectively used by Defendants. In fact, if Plaintiff were to submit two separate memorandums of law, one addressed to the Governing Body’s motion to dismiss and one addressed to the motion to dismiss of WTPA and WTNY, Plaintiff would be permitted up to 50 total pages pursuant to Your Honor’s Individual Practice Rules.

On January 22, 2026, Plaintiff’s counsel requested each Defendants consent to this application. Defendants, however, would not consent absent Plaintiff’s agreement that “no other

requests will be made of us or the Court concerning the arguments for dismissal advanced,” which Plaintiff cannot reasonably agree to at this early stage.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

/s/ Jason S. Giaimo
Jason S. Giaimo

cc: All Counsel of Record (via ECF)