

**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  
SAN FRANCISCO, CA

February 13, 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. We write to advise the Court that pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, in response to Defendants’ motions to dismiss, Plaintiff intends to file an Amended Complaint as of right. *See* Fed. R. Civ. P. 15(a) (a party may amend the party’s pleading once as a matter of course at any time before a responsive pleading is served); *Le Grand v. Evan*, 702 F.2d 415, 417 (2d Cir. 1983) (holding that the filing of a motion to dismiss does not preclude the filing of an amended complaint as of right pursuant to Rule 15(a)); *Barmore v. Cnty. Fair, Inc.*, 2005 U.S. Dist. LEXIS 49588, at \*16-18 (W.D.N.Y. Apr. 22, 2005) (“As the motion to dismiss is not a responsive pleading within the meaning of Rule 15(a), the Amended Complaint was properly filed as of right”). Plaintiff intends to file her Amended Complaint on or before February 24, 2025.

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)