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February 13, 2026

Via ECF

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

Re: STELLA CRISTINA GOMES DE SOUZA v. WATCHTOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, INC.

Civil Action No. 7:25-cv-09458-NSR

Our file: 27208

Dear Judge Roman:

Our firm represents the individual members of the Governing Body of Jehovah's Witnesses ("Governing Body") in the captioned matter. We are in receipt of plaintiff's letter indicating that he intends to amend his complaint as of right.

Fed.R.Civ.P. 15(a) as it currently reads provides:

(1) *Amending as a Matter of Course.* A party may amend its pleading once as a matter of course no later than:

(A) 21 days after serving it, or

(B) if the pleading is one to which a responsive pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier.

Plaintiff's does not contend that this amendment is made within 21 days of service (and we contest service to boot). The motion was served on January 21, 2026, more than 21 days ago. Therefore, under Fed.R.Civ.P. 15(a)(1)(B) there is no amendment as of right.

We do not have the proposed amendment, and our consent to amendment has not been sought. Obviously we cannot consent in a vacuum. We note that we encouraged plaintiff's counsel to make any such applications weeks ago, and he declined to do so.

We would oppose the notion that an amendment would be as of right, and we believe our position is well supported by the Fed.R.Civ.P.

We thank the Court for its kind attention to this submission.

KERLEY, WALSH, MATERA & CINQUEMANI, P.C.



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Witnesses

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cc: All appearing counsel by ECF