From: 212 805 7920 Page: 1/1 Date: 1/2/2013 10:38:20 AM



Telephone (914) 941-5668 Facsimile (914) 941-6091 www.collen/P.com

E-mail: ilindenbaum@collentP.com

December 27, 2012

VIA FACSIMULE (1 PAGE)

Hon. Shira A. Scheindlin United States Courthouse 500 Pearl Street New York, NY 10007-1312 212-805-7920

RE:

Omega SA v. Xie Zhenmin, et al.

Civil Case Number : 12 cv 9338 (SAS)

\*\*EX PARTE - UNDER SEAL\*\*

Dear Judge Scheindlin:

We represent the Plaintiff, Omega SA in the above referenced matter. On December 21, 2012, Your Honor endorsed Plaintiff's exparte temporary restraining order ("TRO"). The Order scheduled a hearing for January 10, 2013 and scheduled opposition papers to be due on January 7, 2013, and reply papers on January 9, 2013. The Order also required Plaintiff to file security by December 28, 2012, and to serve the Defendants by December 31, 2012.

Plaintiff has filed the security with the Court, and now respectfully requests an eight day extension of all remaining deadlines. The additional time is necessary to permit Plaintiff adequate time to complete its service of the TRO on the third party service providers identified in the TRO, and to permit the service providers sufficient time so that they can effectuate the transfer of the counterfeit websites, and execute the other relief set forth in the TRO. This is the first request for an extension of these deadlines.

Plaintiff respectfully requests that the Court endorse the following schedule: the Hearing to convert the TRO to a preliminary injunction shall be on: January 18, 2013 at Opposition papers shall be due by 4:30 pm on January 17, 2013. Plaintiff shall serve Defendants in accordance with the TRO by 5:00pm on January 8, 2013.

December 21 2012

o hereky

Very truly yours, COLLEN IP

effrey A. Lindenbaum

SO ORDERED

-10 10 -0010 ·

. /N/ / WV \_ V

PAPERCUT PROTOCOL

COLLEN IP Intellectual Property Law, P.C., THE HOLYOKE-MANIHATTAN BUILDING, 80 South Highland Avenue, Ossining-on-Hudson, Westchester County, New York 10562 USA