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November 25, 2024

**VIA EMAIL**

Hon. Jennifer L. Rochon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Lashify, Inc. v. Shandongchuangmeiweishengyongpinyouxiangongsi a/k/a  
Qingdao Lody Hair Products Co., Ltd. d/b/a B&Qaugen*  
Case No. 24-cv-8925 (JLR)  
Letter Requesting to Modify and Extend the TRO**

Dear Judge Rochon,

We represent Plaintiff Lashify, Inc. (“Plaintiff”) in the above-referenced action (the “Action”). On November 21, 2024, Plaintiff filed this Action and its Application under seal. On November 22, 2024, the Court granted Plaintiff’s Application and entered the Temporary Restraining Order (“TRO”). Plaintiff respectfully submits modification of Section II of the TRO, specifically the briefing schedule, including the date of the Show Cause Hearing.

After receiving the TRO, Plaintiff promptly served it on the Third Party Service Providers and Financial Institutions via the methods of alternative service authorized by the TRO. As the TRO currently stands, Defendant’s deadline to file opposition to Plaintiff’s Application is Monday, December 2, 2024, therefore, Plaintiff would need to serve Defendants by Friday, November 29, 2024 at the latest for Defendant to have sufficient time to oppose the TRO should it wish to do so. However, in Plaintiff’s counsel’s extensive experience in handling similar temporary restraining orders, the Third Party Service Providers and Financial Institutions typically require at least one (1) week to process and comply with a TRO. In light of the Thanksgiving holiday this week coupled with the volume of Third Party Service Providers and Financial Institutions involved in this Action, Plaintiff respectfully requests that the Court modify the briefing schedule, including the date of the Show Cause Hearing in the TRO to allow the Third Party Service Providers and Financial Institutions additional time to review and comply with the directives of the TRO, including producing the expedited discovery, for Plaintiff to serve Defendant in this Action and for Defendant to file opposition to Plaintiff’s Application should it wish to do so.


Further, as it currently stands, the TRO is set to expire on December 6, 2024, three (3) days before the Show Cause Hearing. *See* Fed. R. Civ. P. 65(b)(2). Should the Court modify Section II of the TRO, Plaintiff respectfully requests the Court extend the TRO to the new date of the Show Cause Hearing on Plaintiff’s Application.

We thank the Court for its time and consideration.

The request for an extension is GRANTED. Defendant's opposing papers shall be due December 9, 2024. Plaintiff shall file any reply papers on or before December 13, 2024. The show cause hearing shall be held on December 16, 2024 at 11:00 a.m. The temporary restraining order shall be extended to December 16, 2024.

Dated: November 25, 2024  
New York, New York

**SO ORDERED.**

  
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**JENNIFER L. ROCHON**  
United States District Judge

Respectfully submitted,  
**EPSTEIN DRANGEL LLP**

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