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BY ECF

Hon. Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street, Room 530
White Plains, NY 10601

Application granted.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 11.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 29, 2026

Re: Abraham Kleinman v. Jacob Frankel, et al.
Case No. 26-cv-4899

Honorable Justice Halpern:

I submit this letter as a pro se defendant in this action seeking an extension of time to respond to plaintiff's complaint until July 31, 2026.

For background, until June 26, 2026, I was counsel to defendants Jacob Frankel and Sheindl Frankel in plaintiff's state court action in Rockland County (Index No. 30127/2026), which was brought for an alleged \$11,500 breach of an oral rental agreement. The federal court action attempts to turn this \$11,500 rental dispute into a civil RICO action. On June 26, 2026, the court in plaintiff's state court action granted my motion to withdraw as the attorney of record for the defendants. I do not represent any other defendants in this action, and am only representing myself.

My office was served with the federal court summons and complaint on June 15, 2026. Therefore, the current deadline for my response to the complaint is July 6, 2026. I request an extension of time until July 31, 2026 in order to have sufficient time to consider whether there is a basis for a motion to dismiss and to prepare the pre-motion letters required by Your Honor's Individual Practices. No other previous requests for an extension of time have been requested by me.

On June 22, 2026, I requested plaintiff's consent by email to my request for an extension of time, but to date, plaintiff has not responded.

Respectfully submitted,



Peter A. Hurwitz