



250 Vesey Street
27th Floor
New York, NY 10281

wmhwlaw.com
T: 212-335-2030
F: 212-335-2040

January 22, 2026

Via ECF

Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Greene v. Healthfirst PHSP, Inc., 25 Civ. 9058 (ER)

Dear Judge Ramos:

We represent Plaintiff Joseph Greene and write in response to Healthfirst's January 16, 2026 request for a pre-motion conference in anticipation of a motion to dismiss. *See* Dkt. 15. Plaintiff disagrees with each of the arguments in Healthfirst's letter and believes that the Complaint states meritorious claims. Nevertheless, to avoid unnecessary motion practice, Plaintiff intends to amend his Complaint by the February 6, 2026 deadline to address issues raised in Healthfirst's letter. *See* Fed. R. Civ. P. 15(a)(1)(B) (plaintiff may amend his complaint as of right within "21 days after service of a motion under Rule 12(b)").

Plaintiff therefore respectfully requests that the Court deny as moot Healthfirst's request for a pre-motion conference, without prejudice to renewal after Plaintiff has filed his Amended Complaint.

Respectfully submitted.

/s/ Jacob Gardener

Jacob Gardener
Walden Macht Haran & Williams LLP
250 Vesey Street, 27th Floor
New York, NY 10281
Tel: (212) 335-2965
jgardener@wmhwlaw.com

Steve Cohen
Andrea Nishi
Pollock Cohen LLP
111 Broadway, Suite 1804
New York, NY 10006
Tel: (646) 517-0542
scohen@pollockcohen.com
andrea@pollockcohen.com

Attorneys for Plaintiff