



49 Market Street
Morristown, NJ 07960-5122
Tel (973) 992-4800 Fax (973) 992-9125
www.foxrothschild.com

JORDAN B. KAPLAN, ESQ.
PARTNER
Direct Dial: 973-994-7819

December 18, 2025

VIA ECF

Clerk of the Court
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Happy Products, Inc. v. Ontel Products Corporation et al*
Civil Action No. 2:24-cv-09819-EP-JRA

Dear Sir or Madam:

We represent plaintiff Happy Products, Inc. ("Plaintiff"). On December 2, 2025, defendant Ontel Products Corporation ("Defendant") filed a counterclaim against Plaintiff. Pursuant to Fed. R. Civ. P. 12(a)(1)(B), Plaintiff's response to Defendant's Counterclaim is due by December 23, 2025. By means of this letter, Plaintiff hereby invokes the provisions of L. Civ. R. 6.1(b), in order to extend the time to file its response to Defendant's counterclaim by 14 days. The time for Plaintiff to respond to the counterclaim has not previously been extended or adjourned, and Plaintiff invokes the provisions of L. Civ. R. 6.1(b) prior to the date that its answer would otherwise be due.

Pursuant to the automatic extension of L. Civ. R. 6.1(b), Plaintiff's response to Defendant's counterclaim is now due by January 6, 2026. As always, we thank the Court for its time and attention to this matter

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jordan B. Kaplan".

Jordan B. Kaplan

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada **New Jersey** New York North Carolina Pennsylvania South Carolina Texas Washington