[Defendant's Solicitor's Name]

[Defendant's Law Firm]

[Address]

[City, State, Zip Code]

Re: Good Vibes Pty Ltd v The Funk Company Ltd - Supreme Court of New South Wales Proceeding No. 2019/447839

Dear [Defendant's Solicitor's Name],

I trust this letter finds you well. I am writing to you on behalf of Baker McKenzie, representing the Plaintiff, Good Vibes Pty Ltd, in the above-mentioned proceeding before the Supreme Court of New South Wales (Equity Division, Commercial List, Sydney).

We refer to the Orders dated 14 December 2018, particularly Order 1, which requires the Plaintiff to file and serve any lay evidence by 12 July 2019. Regrettably, we must inform you that our key witness, Mr. Bob Cunningham, the Managing Director of Good Vibes, is presently overseas due to an unexpected family emergency. Unfortunately, he is unable to fulfill his commitment to be available for an interview with our Barrister, Ally McBeal, to finalize his affidavit.

Given these unforeseen circumstances, we propose a two-week extension for the Plaintiff to file and serve its lay evidence. In the spirit of fairness and efficiency, we would also suggest that the Defendant be granted a corresponding two-week extension to file and serve any lay evidence in reply.

To formalize this proposal, we have attached draft Consent Orders outlining the revised timetable for lay evidence. According to these proposed Consent Orders, the time for the Plaintiff to file and serve any lay evidence would be extended to 26 July 2019, and the time for the Defendant to file and serve any lay evidence in reply would be extended to 9 August 2019. Additionally, we propose listing the matter for a directions hearing at 9.30 am on 16 August 2019.

If your client agrees to these proposed Consent Orders, we kindly request you to sign and return them to Baker McKenzie. Subsequently, we will provide you with a draft joint communication to the court for your review and approval.

We appreciate your prompt attention to this matter and your cooperation in accommodating the unavoidable circumstances that have led to this request. If you have any concerns or require further clarification, please do not hesitate to contact me at [Your Phone Number] or [Your Email Address].

Thank you for your understanding and cooperation.

Yours sincerely,

Your Full Name]

[Your Position]

Baker McKenzie

Attachment: Draft Consent Orders