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March 5, 2024

VIA ECF

The Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SeanPaul Reyes v. The City of New York, 23 Civ. 6369 (JGLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. I write with the consent of plaintiff's counsel to respectfully request an extension of time to file our reply brief in support of the City's motion to dismiss from March 12, 2024 to March 19, 2024. The reason for the request is that the Second Circuit Court of Appeals has now scheduled oral argument on the City's motion for a stay of this Court's preliminary injunction decision for March 12, 2024, which will require the focus of various attorneys who would otherwise be working with me on the reply brief. The requested extension is thus necessary for this office to fully and properly prepare the reply brief.

This is the first such request (other than the extension that was granted when plaintiff requested an extension for his response brief).

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman

cc: All counsel (via ECF)

