



THE CITY OF NEW YORK
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April 2, 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. We write with the consent of plaintiff's counsel to respectfully request that the time to respond to the discovery responses ordered at Docket 85, including plaintiff's request for admissions, be extended from April 5, 2024 to April 19, 2024, for both sides. The reason for the request is that the documents being produced have turned out to be voluminous and additional time is needed. Additionally, the City has raised with counsel for plaintiff the need for a confidentiality order as to some of the documents being produced, and counsel will be discussing that issue as well.

This is the first such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman

cc: All counsel (via ECF)