



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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April 15, 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 19, 2024 to May 3, 2024, for both sides. The parties are working cooperatively to produce the limited discovery agreed to while the remainder of discovery is stayed pending the outcome of the City's pending motion to dismiss. The City has now forwarded to plaintiff's counsel a draft protective order. Further, because of the voluminous nature of the documents that will be produced, additional time is needed for me to review what I have received from NYPD and to prepare it for production. The additional time requested will not affect any other deadlines in the case.

This is the second such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)

