

MEMO ENDORSED



**THE CITY OF NEW YORK
LAW DEPARTMENT**
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
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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

Application GRANTED. The time to respond is extended to May 3, 2024.

**Dated: April 15, 2024
New York, New York**

SO ORDERED.

Handwritten signature of Jessica G. L. Clarke in blue ink.

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

JESSICA G. L. CLARKE
United States District Judge

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)

