



June 4, 2026

VIA ECF

The Honorable Jeannette A. Vargas
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Coe, et al. v. Blanche, et al.*, No. 1:26-CV-04641-JAV
**Joint Letter Motion to Extend Briefing Deadlines and Adjourn Court
Conference Scheduled for June 10, 2026**

Dear Judge Vargas,

We represent Plaintiffs in the above-captioned matter. Pursuant to Local Civil Rule 7.1(e) and Rule 3.E of the Court's Individual Rules and Practices in Civil Cases, we write jointly on behalf of all the parties regarding this Court's Order of June 3, 2026. ECF 18.

Counsel for Plaintiffs, the DOJ Defendants, and the NYU Defendants have met and conferred regarding the briefing schedule for Plaintiffs' request for a temporary restraining order, ECF 8; the deadline for the production of the information and records at issue in this case, which was set for June 10 at 9:00am, *see* ECF 1, Compl. Ex. A (NYU Subpoena) at 1; and the June 10 Conference, as per the Court's June 3 Order.

In order to allow for more orderly briefing and accommodate conflicting deadlines for counsel of the various parties, the parties have met and conferred and jointly stipulate to the following:

Recognizing that it is the government's position that it cannot confirm any details related to any possible grand jury subpoenas, *see* Fed. R. Crim. P. 6(e), the parties hereby stipulate as follows:

No healthcare institution located in New York City, including NYU Langone Hospitals, shall be required to produce or disclose any material covered by the lawsuit (i.e., identifying and sensitive health information) to the U.S. Department of Justice, or any component thereof, before June 24, 2026. This includes the NYU Defendants pursuant to the Subpoena. The United States will not obtain any such documents or materials prior to June 24, 2026.

In light of the foregoing, the NYU Langone defendants likewise stipulate that they will not produce any materials covered by the lawsuit to the U.S. Department of Justice, or any component thereof, prior to June 24, 2026.





Based on the above stipulation, the parties jointly request that the Court modify the current briefing and hearing schedule with regards to Plaintiffs' motion for a temporary restraining order, as follows:

	Original Deadline	Proposed Deadline
Defendants' response brief to Plaintiffs' motion for TRO	June 5, 2026, by noon	June 15, 2026, by noon
Plaintiffs' reply brief	June 6, 2026	June 18, 2026
Joint response to the Court's June 3, 2026 Order, ECF 18	June 9, 2026, by noon	June 18, 2026
Hearing on TRO motion and Conference to address matters pursuant to June 3, 2026 Order	June 10, 2026, at 2:30pm	June 22, 2026 (and in any event prior to June 24, 2026)

As reflected above, and in light of the above stipulation and proposal, the parties respectfully request that the Court adjourn the June 10, 2026 conference date, and propose that said conference, along with any hearing on Plaintiffs' TRO motion, occur on June 22, 2026, or on any other date prior to June 24, 2026 that is acceptable to the Court.

No previous requests for extensions or adjournment have been made by any party.

We thank the Court for considering this joint request.

Sincerely,

/s/ Omar Gonzalez-Pagan

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