



STEVEN BANKS
Corporation Counsel

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

TONYA JENERETTE
phone: 212-356-1983
email: tjeneret@law.nyc.gov

June 29, 2026

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Chen v. Mamdani, et. al. 26 cv 03355 (ER)(OTW)

Dear Judge Ramos:

I write in response to the June 24, 2026 letter of the NAACP Legal Defense & Education Fund, Inc. ("LDF") written on behalf of the Proposed Defendant Intervenors.¹

While the City can and will adequately defend the legality of the challenged changes to the Discovery Program, Defendants consent to the motion of the Proposed Defendant-Intervenors due to the expertise of their counsel and because the testimony of the advocacy organizations and individual students may offer important perspectives on the Discovery Program and racial diversity at the Specialized High Schools. Specifically, the advocacy organizations that seek to intervene in this matter have adequately defended the challenged changes to the Discovery Program as intervenors in the related case of *McAuliffe Intermediate School v. Bill de Blasio, et. al.*, 18 cv 11657 (ER)(OTW); and the Proposed Intervenors include students currently attending Specialized High Schools, including two admitted through the Discovery Program, who are interested in "preserving socioeconomic, geographic and racial diversity in their student populations and decreasing racial isolation in their schools."^[1]

¹The Proposed Defendant Intervenors are: Latino Justice PRLDEF, New York Civil Liberties Union, American Civil Liberties Union, Teens Take Charge, Desis Rising UP and Moving, Coalition For Asian American Children and Families and Veronica Carasquillo, on behalf of her minor child, A.C.; Wang Jin Hua, on behalf of her minor child, A.Z.; Halimatou Diallo, on behalf of her minor child K.D.; Jennifer Velez, on behalf of her minor child G.R.

^[1] Dkt. 34.

For these reasons, Defendants consent to the proposed intervention provided that the Proposed Defendant-Intervenors do not: (i) materially expand discovery; (ii) join new parties; (iii) bring a cross-claim against Defendants; or iv) seek relief other than dismissal of the action. If the Proposed Defendant-Intervenors were to pursue claims that are collateral to the issues before the Court, the result would be protracted litigation and the possible intervention of additional parties. If the Proposed Defendant-Intervenors can provide assurances that the litigation will not be so diverted, Defendants consent to the motion to intervene.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Tonya Jenerette', is written over the typed name and title. The signature is stylized with a large loop at the end.

Tonya Jenerette
Assistant Corporation Counsel