

NATIONAL SECURITY
PROJECT



September 18, 2013

BY ECF

Honorable Pamela K. Chen
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
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Re: *Raza et al. v. City of New York et al.*
Case No. 13-cv-03448-PKC-JMA

OFFICERS AND DIRECTORS
SUSAN N. HERMAN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

Dear Judge Chen:

On behalf of Plaintiffs in the above-captioned matter, we write to respectfully request a change in date for the pre-motion conference at which we will present an order to show cause for expedited discovery in support of a preliminary injunction motion.

The Court has scheduled this conference for October 1, 2013, at 2:00 p.m. However, Plaintiffs' counsel from the American Civil Liberties Union have a previously-scheduled argument before the Second Circuit Court of Appeals at that time. Plaintiffs' counsel from the New York Civil Liberties Union and counsel for the Defendants both have a previously-scheduled hearing in another matter on the morning of October 1, 2013.

Plaintiffs' counsel have made no prior requests to this Court for adjournment or enlargement of time. We have consulted with counsel for the Defendants, and they consent to our request to reschedule this conference. In order to assist the Court in considering alternative dates, we set forth below the parties' availability.

Plaintiffs' counsel are available on the following dates:

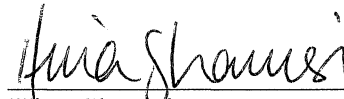
- October 2, at any time;
- October 3, at any time;
- October 7, at any time;
- October 8, at 3 p.m. and after; and
- October 9, between 9 a.m. to 11 a.m. and at 2 p.m. or after.

Of these dates, Defendants' counsel are available at any time on:

- October 7;
- October 8; and
- October 9.

We thank the Court for considering this request and hope the Court will be able to accommodate it.

Respectfully submitted,



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