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October 11, 2013

BY ECF

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

Re: <u>Raza et al. v. City of New York et al.</u>, 13 Civ. 3448 (PKC)(JMA)

Dear Judge Chen:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, and one of the attorneys assigned to the above-referenced matter. I write to respectfully request that defendants' opposition in response to plaintiffs' Motion For Expedited Discovery filed October 8, 2013 be due on Wednesday, October 30<sup>th</sup>, 2013.

The time to oppose the plaintiffs' motion is needed as plaintiffs' have filed an 18 page memorandum of law, two proposed discovery schedules and a declaration with exhibits exceeding 100 pages. Defendants will need to respond with a full memorandum of law and any declarations or exhibits needed to address plaintiffs' submissions.

Under these circumstances, defendants respectfully request that their opposition to plaintiffs' motion be due on October 30, 2013. Plaintiffs' counsel Hina Shamsi, Esq. objects to this request but consents to a due date of October 23, 2013.

Thank you for your consideration of this request.

MICHAEL A. CARDOZO Corporation Counsel Case 1:13-cv-03448-PKC-JMA Document 22 Filed 10/11/13 Page 2 of 2 PageID #: 354

Respectfully Submitted,

bit lery Alexis L. Leist

Assistant Corporation Counsel

cc by ECF: Plaintiffs' Counsel