

**VIA ECF and
FIRST CLASS MAIL**

January 25, 2008

Honorable Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **KAMBUROWSKI v. Kidd, No. 05-CV-0953 (CBA/RLM)**

Dear Judge Amon:

Please accept this letter as an application for reconsideration of your order of January 24, 2008, denying the Plaintiff's motion for extension of time to submit responsive papers to the Government's Motion for Summary Judgment. The Government's Motion for Summary Judgment which was filed in this matter on or about November 2, 2007, was filed after Defendant's counsel Mr. Steve Kim, was granted several extensions of time to submit a reply in this matter, all of which were graciously consented to by Plaintiff's counsel. The instant extension request has also been consented to by Defendant's counsel. Additionally, the attorney who has been handling this matter in our firm, Ms. Delli-Pizzi, has recently left our firm (this month), and consequently, I will personally be handling the completion of this matter, along with several other pressing matters with deadlines in January and early February.

While I have spoken with Ms. Delli-Pizzi throughout this litigation, due to previously scheduled commitments in the nature of several Court appearances and Circuit Court brief deadlines in the months of January and February, I will need this additional time to become more familiar with this matter and properly respond to Defendant's motion. As such, I hereby respectfully request that you reconsider your January 24, 2008 decision, and grant the parties the following revised schedule:

Plaintiffs' Opposition Papers:	February 19, 2008
Defendants' Reply Papers:	March 4, 2008

In addition, I ask that the oral argument currently scheduled for February 21, 2008, be adjourned to a date after March 4, 2008. I have discussed this request with Assistant United States Attorney F. Franklin Amanat, and he has agreed to this extension of time and proposed schedule.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/
Michael P. DiRaimondo

cc: F. Franklin Amanat
Assistant U.S. Attorney