



COUNTY OF NASSAU  
OFFICE OF THE COUNTY ATTORNEY  
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June 9, 2006

**ELECTRONICALLY FILED**

Honorable Joanna Seybert  
United States District Court Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: **Seabury v. The People of the State of New York, et al.**  
**06-CV-2539 (NGG) (LB)**

Dear Judge Garaufis:

This office represents the County of Nassau in the above-referenced action.

Specifically, we respectfully ask the Court to extend by sixty (60) days the aforementioned defendant's time to respond to the Complaint. The response is currently due on June 13, 2006. However, as Plaintiff has filed a fifty-three page Complaint with causes of action that go back to 1996, additional time is needed to properly investigate the allegations in the Complaint. We have attempted to contact the Plaintiff at the number provided on page three of the Complaint but were unable to reach him. There have been no prior extension requests made by the County.

Accordingly, we respectfully ask the Court to extend by sixty (60) days, until August 14, 2006, our time to respond to the Complaint.

Respectfully submitted,

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/s/  
Nancy Nicotra (NN 3004)  
Deputy County Attorney

cc: Major C. Seabury  
Elizabeth A. Forman, Office of the Attorney General of the State of New York  
Suffolk County Attorney's Office