



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

MICHAEL A. CARDOZO
Corporation Counsel

WILLIAM VIDAL
Assistant Corporation Counsel
phone: (212) 788-8683
fax: (212) 788-8871
email: wvidal@law.nyc.com

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Extra pages are denied. Defendants are directed to include a final brief point stating in one sentence each (at most) the grounds for dismissal of those claims for relief that they deem most marginal. If the Court is not inclined to dismiss those claims, it will grant defendants leave to file a supplemental brief before ruling on the motion.

BY ECF

Honorable Brian M. Cogan
United States Judge
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

SO ORDERED.

8/31/10

Re: Gounden v. City, et al., Index No. 10 CV 3438

[Signature]
U.S.D.J.

Dear Judge Cogan:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel for the City of New York, and at this time, this office is representing the City of New York, Joseph Addabbo, and Helen Marshall.

I am writing to request permission to exceed the twenty-five page limit placed on memorandums of law submitted in support of a motion. Per the Court's order, City defendants will be submitting on September 8, 2010 a motion to dismiss. Because the complaint asserts twenty-six causes of action against several defendants on multiple statutory and common law grounds, it will be necessary to exceed the twenty-five page limit in order to respond to all the issues raised in the complaint. Currently, City defendants' memorandum of law is 23 pages, and there remains several state claim related issues to address. Therefore, I respectfully request a ten-page extension to address these remaining issues.

Thank you for your consideration.

Sincerely yours,
/s/
William Vidal
wvidal@nyc.law.gov
(212) 788-8683

CC: Kris Gounden (by e-mail and mail)