

LAW OFFICE OF AMY JANE AGNEW, P.C.

Honorable Loretta A. Preska
Senior Justice, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

March 10, 2025

VIA ECF

Re: *Milburn/Beriquete, 79-cv-5077*

Dear Judge Preska:

I write in response to the Court's order of February 11, 2025 (dkt. no. 875) and the letters submitted by Milburn/Beriquete class members at dkt nos. 872-874. The parties were to address some outstanding issues with the Court via letter today, however, I respectfully request an extension of time until March 31, 2025.

As the Court is no doubt aware, the staffing situation in NY State prisons has barely improved since my last letter. Though there was some sort of agreement between the State and the corrections officers' union, many officers have refused to return to work. Though I do not believe things are as dire in Green Haven as other prisons, we were only alerted mid-week last week that Green Haven was restarting legal calls. Green Haven has not yet restarted legal visits.

Additionally, as the Court may know, Mr. Schulze has retired from the NYS Office of the Attorney General (he said he will miss **some** things about litigating against me (emphasis in original), I take this as high praise), but I do want to confer with his successor about some issues at Green Haven before approaching the Court. However, the first order of business is to speak and meet with our clients. We are working on scheduling some calls consistent with the facility's resources.

In sum, given the on-going issues with DOCCS' staffing, Plaintiff's respectfully request an extension of time to address the Court until March 31, 2025.

As always, we thank the Court for its continuing courtesies.

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Very truly yours,

/s/ AJ Agnew

Amy Jane Agnew, Esq.
Counsel for Plaintiff Class

Plaintiff's counsel's request for an extension is GRANTED. Counsel shall submit a letter no later than March 31, 2025 advising the Court as to the responses to the class members' letters. The Clerk of the Court shall close docket number 883.

SO ORDERED.

Dated: March 11, 2025



LORETTA A. PRESKA, U.S.D.J.