



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

**JAMES E. JOHNSON**  
*Corporation Counsel*

**DANIEL G. SAAVEDRA**  
*Senior Counsel*  
phone: (212) 356-0892  
fax: (212) 356-3509  
e-mail: [dsaavedr@law.nyc.gov](mailto:dsaavedr@law.nyc.gov)

April 14, 2020

**BY ECF**

Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Samuel Small v. City of New York, et al.*, 09 Civ. 1912 (DAB)(SDA)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel for the City of New York, and the attorney assigned to the defense of the above-referenced matter. The parties write to respectfully request an extension of time to submit certain pre-trial submissions presently due on April 15, 2020.

By way of background, plaintiff Samuel Small alleges that the defendants violated his constitutional rights on three occasions while he was a New York City Department of Correction ("DOC") detainee. On March 27, 2020, the Court endorsed the parties proposed deadlines for pretrial filings. *See* Docket Entry No. 279.

Since that time, the parties have endeavored to craft joint filings pursuant to the Court's Individual Rules and Practices. However, the current public health crisis and the attendant social distancing requirements have slowed this process. The parties, therefore, respectfully request permission to file the following documents on April 22, 2020: the Joint Pre-Trial Statement, the Joint Proposed Voir Dire, the Joint Proposed Jury Charge, and the Joint Proposed Verdict Sheet. The parties anticipate filing motions in limine on April 15, 2020 and responding to the same by May 6, 2020, in accordance with the previously agreed upon schedule. As such, this extension of time should not impact any other deadlines in this matter.

Defendants thank the Court for its consideration of this request.

Respectfully submitted,



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Daniel Guillermo Saavedra  
*Senior Counsel*

cc: *BY ECF*  
Counsel for Plaintiff

Application granted.

SO ORDERED.



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Hon. Ronnie Abrams  
4/15/2020