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<u>BY ECF & EMAIL</u> (Andrei_Vrabie@nysd.uscourts.gov)

Honorable Robert W. Sweet United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: <u>Schoolcraft v. The City of New York, et al.</u> 10-CV-6005 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent City defendants in the above-referenced matter. I write on behalf of all defendants to submit the enclosed proposed Joint Pre-Trial Order, pursuant to the Court's Individual Practices.

The proposed JPTO attempts to incorporate in good faith comments and information from plaintiff to the extent that we have received any. For the reasons separately explained in the City defendants' opposition to plaintiff's motion for an extension of time, also joined by all defendants, the City defendants, joined by all defendants, respectfully request that the Court 'So Order' defendants' JPTO, notwithstanding plaintiff's belated application for an extension of time to file the JPTO.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Alan H. Scheiner Senior Counsel Special Federal Litigation Division

Encl.

cc: Nathaniel Smith (By E-Mail) Attorney for Plaintiff Gregory John Radomisli (By E-Mail) MARTIN CLEARWATER & BELL LLP Attorneys for Jamaica Hospital Medical Center

> Brian Lee (By E-Mail) IVONE, DEVINE & JENSEN, LLP Attorneys for Dr. Isak Isakov

Matthew Koster (By E-Mail) CALLAN, KOSTER, BRADY & BRENNAN, LLP Attorneys for Lillian Aldana-Bernier

Walter A. Kretz , Jr. (By E-Mail) SCOPPETTA SEIFF KRETZ & ABERCROMBIE Attorney for Defendant Mauriello