

ZACHARY W. CARTER Corporation Counsel

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## BY ECF

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

Re: Schoolcraft v. City of New York, et al., 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 the City Defendants in the above-referenced matter. I am writing to advise the Court that, pursuant to the signed Stipulation and Protective Order as to Documents Produced by City Defendants (*see* Docket No. 105), the signed Stipulation and Protective Order for Attorneys Eyes Only (*see* Docket No. 104), and the Stipulation and Protective Order regarding expert materials of October 1, 2014 (see Docket No. 275) (all enclosed), the City Defendants are filing the following under seal:

- 1. An unredacted version of City Defendants' Memorandum of Law in Support of their Motion *In Limine* to Preclude Plaintiff from Offering Certain Evidence at Trial (*see* Docket No. 499).
- 2. Exhibit G and Plaintiff's Trial Exhibits ("PTX") 4, 6, 13, 16, 18, 22, 25, 26, 29, 30, 33, 34, 35, 40, 42, 46, 49, 50, 51, 52, 53, 54, 55, 57, 59, 60, 62, 64, 65, 66, 72, 84, 93, 95, 306, 308, 309, 314, 316, 400, 401, 402, 403, 406, 407, 408, 409, 420, 421, 426, and 427, which are referenced in City Defendants' Memorandum of Law in Support of their Motion *In Limine* to Preclude Plaintiff from Offering Certain Evidence at Trial (*see* Docket No. 499).
- 3. An unreducted version of City Defendants' Memorandum of Law in Support of their Motion *In Limine* to Preclude Expert Testimony (*see* Docket No. 496).

4. Exhibit D, G, H, and I, and PTX 66, which are referenced in City Defendants' Memorandum of Law in Support of their Motion *In Limine* to Preclude Expert Testimony (*see* Docket No. 496).

A courtesy copy of these materials will be delivered to the Court's chambers.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Alan Scheiner\_\_\_\_

Alan Scheiner Senior Counsel

Encl.

cc: All counsel (via ECF)