

Schoolcraft v. The City of New York et al Doc. 619

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April 19, 2016

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

Re: *Schoolcraft v. The City of New York, et al*
Index No. 10-cv-6005

Dear Judge Sweet:

On behalf of all of plaintiff's counsel, I am writing now to clarify the Court's ruling on plaintiff's request, submitted on April 18, 2016, for an extension of time for plaintiff to submit Reply papers on the pending fee application. On this date, plaintiff had requested that the Court issue an Order, *nunc pro tunc*, extending plaintiff's time to submit a Reply brief on the fee application from April 15, 2016 to April 29, 2016, and if the Court granted this request, adjourning the date for oral argument on the fee application from May 4, 2016, until May 12, 2016.

On April 19, 2016, the Court issued an Order which appears to have granted plaintiff's application, as the Court has reset the oral argument date for May 12, 2016. However, the Court did not set April 29, 2016 as the new Reply date, but rather, set April 22, 2016 as the date. Since the new oral argument date was linked to the new Reply date – and since the Court granted the new Reply date – it would appear that the Court's decision to set April 22, 2016 as the Reply date was inadvertent. If indeed this is the case, plaintiff respectfully requests that the Court issue a new Order resetting the date for the Reply brief from April 22, 2016 to April 29, 2016.

In the event that the Court's decision to set the Reply date for April 22, 2016 was not inadvertent, Plaintiff would still respectfully request that the Court issue a new Order setting the Reply date for April 29, 2016. Since the City did not oppose plaintiff's request for an April 29, 2016 date – and since the City's opposition papers consist of several hundred pages (including the expert Declaration and supporting exhibits) – Plaintiff's counsel needs additional time to respond to the City's voluminous submissions.

Based on the foregoing, plaintiff respectfully asks that the Court issue an Order setting the date to file his Reply brief from April 22, 2016 until April 29, 2016.

We thank the Court for consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jon L. Norinsberg', with a long horizontal flourish extending to the right.

Jon L. Norinsberg

By ECF and e-mail
cc: all Counsel
(by e-mail)