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DOC#: \_\_\_\_\_  
DATE FILED: 3/20/2020

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

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

**JOSEPH ZANGRILLI**  
*Senior Counsel*  
Phone: (212) 356-2657  
Fax: (212) 356-3509  
jzangril@law.nyc.gov

March 19, 2020

**BY ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: Jermaine Dunham v. City of New York,  
11 Civ. 1223 (ALC) (SLC)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. I write to respectfully request a two-week extension of time from March 20, 2020 until April 3, 2020, in which to file defendants' motion for summary judgment. Plaintiff's counsel, Jason E. Kornmehl, Esq., consents to this request. This is defendants' second request for an extension of time to file their motion for summary judgment.

Due to the ongoing health crisis, the Corporation Counsel has encouraged all employees to work from home. As a result, I have been unable to complete certain tasks related to motion that require my personal presence, including the assembling of exhibits. In addition, as my Office adjusts to these new and constantly changing circumstances, I have encountered several technical issues related to remote access that have prevented access to key documents and files. It is my hope to visit my office during off hours in order to obtain the necessary documents required to complete the motion and believe a two-week extension of time will allow me to do so in a safe and responsible manner. Defendants are also requesting a corresponding extension of time for the filing of opposition and reply papers to May 1, 2020 for opposition and May 15, 2020 for reply.

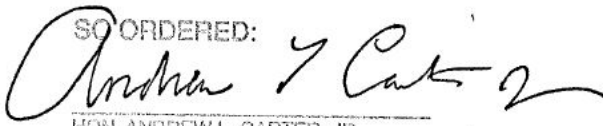
Defendants thank Your Honor for your consideration herein and apologize for the late hour of this request.

Respectfully submitted,

/s/

Joseph Zangrilli  
*Senior Counsel*  
Special Federal Litigation Division

CC: Maxwell W. Brown, Esq. (*Via ECF*)  
Jason E. Kornmehl, Esq. (*Via ECF*)

SO ORDERED:  
  
\_\_\_\_\_  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
March 20, 2020