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Honorable Ronnie Abrams via ECF
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

September 17, 2021

Re: Marc Ameruso v. The City of New York, et al.,
15 Civ. 3381 (RA)

Your Honor:

I am the attorney representing defendants in the above-referenced action. I write jointly with plaintiff's counsel to request an extension of 1-week for the parties to file their pre-trial submissions, from the current due date of October 4, 2021 to October 11, 2021 and a corresponding 1-week extension for oppositions and replies. This is the first request for an extension and no other dates will be affected by this request.

This case is to be tried by a jury, and therefore per Your Honor's Individual Practices, requires a joint pretrial order, motions in limine, as well as joint proposed voir dire questions, verdict form, and jury instructions to be filed. Currently the deadline for these submissions is October 4, 2021, with oppositions due October 11, 2021, and replies due October 18, 2021. Dkt. No. 144. The parties respectfully request a 1-week extension of these deadlines. I currently have several deadlines in the next month on other matters which will also require my attention and I would greatly appreciate one more week to be able to devote the necessary time to these submissions. Thank you for your consideration herein.


Respectfully submitted,

Soo-Young Shin/s/
Soo-Young Shin
Assistant Corporation Counsel

cc. Bryan Swerling
Attorney for Plaintiff

Application granted.

SO ORDERED.


Hon. Ronnie Abrams
09/20/21