

**MEMO ENDORSED****THE CITY OF NEW YORK  
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November 22, 2019

**BY ECF**Hon. Edgardo Ramos, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007Re: Martin Bleiwas v. City of New York, et al. , 15-CV-10046

Dear Judge Ramos,

I write to request that, if possible, the pre-trial conference scheduled in this matter for December 4, 2019 at 3:30 p.m. be moved to 4:30 p.m., converted into a telephone conference, or both. I have consulted with plaintiff's counsel, Lissa Green-Stark, regarding this application, and she consents to all these options.

The basis for this request is that I have a trial starting before Judge Woods on December 9, 2019. Because of the Thanksgiving holiday, a number of my clients and witnesses in that case have taken off next week, and thus are unable to prepare for trial until the week of December 2. There are a number of witnesses, and as a result, I am trying to see what I can do to open up larger slots of time that week to accommodate their competing schedules. To that end, I had hoped that perhaps we could push the conference in this case back by an hour, allow for it to proceed telephonically, or both. I anticipate, though perhaps I am mistaken, that the Court intends to discuss scheduling for trial and pre-trial submissions at the next conference, which hopefully we could accomplish by phone. In the event that the Court cannot accommodate these requests, I am still available to proceed at the original time, in person.

Thank you for your consideration.

The motion is granted. The status conference set for 3:30 p.m. on December 4 is rescheduled as a telephone conference at 4:30 p.m. The Court will provide the parties with call-in information by email.

Edgardo Ramos, U.S.D.J

Dated: Nov. 25, 2019

New York, New York

Respectfully Submitted,

*Elissa P. Fudim*

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Senior Counsel