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BY ECF

MEMO ENDORSED

The Honorable Edgardo Ramos
 United States District Judge
 40 Foley Square
 New York, New York 10007

Re: *Martin Bleiwas v. City of New York, et al.*, 15 CV 10046 (ER)

Dear Judge Ramos:

I represent the plaintiff in the above-referenced civil rights action. I write with defendants' consent to request an adjournment of the trial, which is scheduled to commence on January 10, 2022, to a date that is convenient to the Court and the parties in the late second or third quarter of 2022. If the Court were inclined to grant this request, we would request corresponding extensions of the deadlines for all pre-trial submissions, as well as an adjournment of the pre-trial conference scheduled for January 6, 2022. The JPTO is currently due November 22, 2021, and other pre-trial filings are currently due on December 13, 2021.

There are a number of reasons for this request. As an initial matter, the parties are anxious for this case to reach a conclusion. With the recent appearance of new defense counsel, the parties have re-opened settlement discussions, and intend to work cooperatively to confirm if this case can now be settled in lieu of trial. In this regard, the parties may seek the assistance of the assigned magistrate, but agree that it is premature at this point to ask for a reference. Further, in addition, an adjournment would help alleviate a crush of trials for the undersigned, as I have a continued state court trial in mid-December, and I am scheduled to try a jury trial in the Northern District commencing on January 18, 2022. The requested adjournment will allow the parties to first focus on a potential resolution while conserving the parties' and the Court's resources. Finally, we ask for late second quarter if not third quarter as I have two trials scheduled in April 2022.

Thank you for your consideration.

Respectfully,

Brett Klein

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cc: Joshua Lax (by ECF)

The parties' requests for an adjournment of the trial, corresponding extensions of the deadlines for all pre-trial submissions, and an adjournment of the pre-trial conference are GRANTED. The trial is hereby adjourned to June 21, 2022 at 10 a.m. The pre-trial submissions are hereby due on May 23, 2022, with responses due on June 6, 2022. The pre-trial conference is hereby adjourned to June 16, 2022 at 2 p.m. It is SO ORDERED.


 Edgardo Ramos, U.S.D.J.

Dated: 11/22/2021

New York, New York