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April 29, 2020

VIA ECFHonorable Judge Vernon S. Broderick
United States District Court Judge
40 Foley Square, Room 415
New York, NY 10007APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 4/30/2020The post-discovery conference scheduled for June 18,
2020 is adjourned to September 18, 2020 at 11:00 am.**Re: Forte v. McNellis, et al., Case No. 1:16-cv-00560-VSB (S.D.N.Y.)**

Dear Judge Broderick,

We represent Plaintiff Daniel Forte as limited pro bono counsel in the above-referenced matter pursuant to Your Honor's Order dated November 30, 2018. (ECF No. 124.) Pursuant to Rule I.G. of Your Honor's Individual Rules & Practices in Civil Cases, we write on behalf of all parties to respectfully request an extension of the deadline to complete fact discovery from June 1, 2020 to September 1, 2020, and an adjournment of the status conference scheduled for June 18, 2020.

The parties previously requested and Your Honor granted extensions of the deadline to complete fact discovery in February 2020 and March 2020. (*See* ECF Nos. 156 and 163.) The most recent request for an extension was made in light of safety concerns and travel and workplace restrictions arising from the current COVID-19 pandemic. Although the parties had hoped that this public health crisis would quickly abate, widespread travel and workplace restrictions remain in place and have made it impossible for counsel to prepare for and complete the depositions of the defendant police officers, which is the last component of discovery that remains outstanding. Accordingly, to account for the uncertainty of when safety concerns will subside and restrictions will be lifted, the parties respectfully request a further extension of the deadline to complete fact discovery to September 1, 2020, and an adjournment of the status conference scheduled for June 18, 2020 to a convenient date and time in September 2020.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jonathan P. Gordon
Jonathan P. Gordoncc: By ECF
Counsel of Record