



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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July 27, 2020

**VIA ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Ewers v. City of New York, et al., 17-CV-1116 (NRB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants in the above referenced matter. In that capacity, I write to respectfully request a thirty (30) day extension of time, from August 3 to September 3, 2020, to file defendants' motion for summary judgment. This is the first request for an extension of this deadline. Plaintiff *pro se* did not respond to counsel's attempt to gain his position on this request.

At the Court's request, defendants filed a pre-motion conference letter on June 10, 2020, outlining defendants' anticipated motion for summary judgment. See Docket No. 118. The Court granted defendants permission to file their motion, and set the following briefing schedule: motion due August 3; opposition due September 2; reply due September 17. See Docket No. 119.

There are two reasons for this extension request. First, I will be out of the office the week of July 27, the week before the motion is due, and need additional time to finalize defendants' motion. Second, I am currently in motion practice in two other cases, and my replies in those matters are due August 14 and August 20, respectfully.<sup>1</sup> Accordingly, I respectfully

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<sup>1</sup> I am currently in motion practice in the matters of Hoa Lay v. Sea Gate Association, et al., 19-CV-3076 (EFK) (RML), currently pending in the Eastern District of New York, and Ramon Guity v. City of New York, et al., 18-CV-10234 (PGG) (SDA), pending in the Southern District of New York.

request the thirty day extension to file defendants' motion in this case to ensure I have sufficient time to complete all motions.

Thank you for your consideration of the herein.

Respectfully submitted,

/s/

Erin Teresa Ryan  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: **By ECF and E-Mail**  
Altura St. Michael Ewers, Plaintiff *Pro Se*

Application granted. Final extension.  
Defendants' motion for summary judgment is due September 2, 2020; plaintiff's opposition is due October 2, 2020; defendants' reply is due October 19, 2020.



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: July 29, 2020