



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
Corporation Counsel

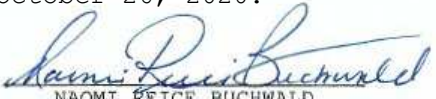
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September 1, 2020

**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

Application granted. Defendants' motion for summary judgment is due September 9, 2020; plaintiff's opposition is due October 9, 2020; defendants' reply is due October 26, 2020.

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE  
Dated: September 1, 2020

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 brief one week extension of time, from September 2 to September 9, 2020, to file defendants' motion for summary judgment due to a family emergency. This is the second request for an extension of this deadline. Plaintiff *pro se* did not respond to counsel's attempt to gain his position on this request. However given the urgency of this request, plaintiff may not have had an opportunity to respond to the undersigned's email requesting his position.

As the Court is aware, defendants previously requested an extension of this deadline, which Your Honor granted on July 27. See Docket Nos. 120-121. As Your Honor noted that it would be the final extension of this motion, I have been working on defendants' motion and was set to file it tomorrow as scheduled. However, a family medical emergency arose this weekend that has required much of my time and attention the last few days. While I have done my best to continue working on the motion, I have been unable to finalize the motion given the family emergency that arose.

Accordingly, I am respectfully requesting a brief one week extension of time to finalize and file defendants' motion. I sincerely apologize to the Court and plaintiff for this unforeseen delay.

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*