

MEMO ENDORSED

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**LAW OFFICES OF**  
**WILLIAM CAFARO**

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January 24, 2020

*Via ECF and e-Mail*

Andrew L. Carter, Jr., U.S.D.J.  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, NY 10007  
[ALCarterNYSDCchambers@nysd.uscourts.gov](mailto:ALCarterNYSDCchambers@nysd.uscourts.gov)

Re: Schaper v. Bronx Lebanon Hospital Center, *et al.*  
1:17-cv-1246(ALC)(OTW)

Your Honor:

This office represents the Plaintiff in the above referenced employment discrimination action brought under Title VII of the Civil Rights Act of 1964, the New York State Human Rights Law and the New York City Human Rights Law. We write, with the consent of the Defendants, to respectfully request an extension of time for the Parties to file a Joint Pre-Trial Order (“JPTO”) to **March 6, 2020**. Under the Court’s individual rules of practice, the JPTO was due on October 30, 2019, 30 days after the Court denied the Defendants’ Motion for Summary Judgment (the “Motion”). However, since the Court’s Order on the Motion, the Parties have litigated Plaintiff’s motion to amend her complaint, Plaintiff has filed her Amended Complaint, and on January 22, 2010, the Defendants’ timely filed their Answer to the Plaintiff’s Amended Complaint. Given this procedural history, the Parties believe that the extension of time to file the JPTO is warranted. No previous requests for an extension to file the JPTO have been made.

We thank the Court for its courtesy in this matter.

Respectfully submitted,  
LAW OFFICES OF WILLIAM CAFARO

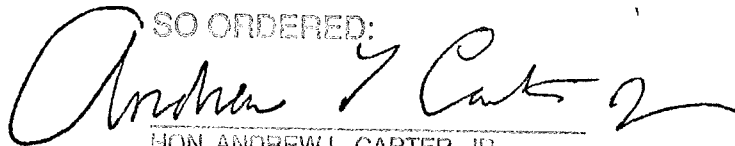


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Amit Kumar, Esq. (AK 0822)

Re: Andrew L. Carter, Jr. U.S.D.J.  
Schaper v. Bronx Lebanon Hospital Center, *et al.*  
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SO ORDERED:



HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

1/27/2020