



## U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

March 30, 2020

**VIA ECF**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
40 Foley Square, Room 2202  
New York, NY 10007

Re: Natural Resources Defense Council v. U.S. Environmental Protection Agency,  
17 Civ. 5928 (JMF)

Dear Judge Furman:

This Office represents defendant U.S. Environmental Protection Agency (“EPA”) in the above-referenced Freedom of Information Act case. Due to recent COVID-19 related work disruptions and the undersigned attorney’s expanded childcare obligations, I write to respectfully request that the deadlines in the Court’s endorsed briefing schedule [ECF No. 87] be extended by one week. This is EPA’s first request for an extension of the briefing deadlines. Plaintiff NRDC consents to this request.

- EPA’s second motion for summary judgment, including its *Vaughn* index: April 8, 2020
- NRDC’s opposition and cross-motion for summary judgment: May 4, 2020
- EPA’s opposition to NRDC’s cross-motion and its reply in further support of its summary judgment motion: May 28, 2020
- Plaintiff’s Reply in further support of its Cross-Motion: June 12, 2020

We thank the Court for its consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

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Application GRANTED. The parties' proposed briefing schedule is hereby adopted. The Clerk of Court is directed to terminate ECF No. 88. SO ORDERED.

March 30, 2020

cc: All Counsel of Record (via ECF)