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September 20, 2024

Granted. The proposed settlement of all issues but for attorney's fees is due September 27, 2024.

VIA ECF

Hon. Denise L. Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

September 23, 2024

Re: *J.L. v. NYC Dep't of Education.*, 17-CV-7150 (DLC)

Dear Judge Cote:

I am the Special Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendant New York City Department of Education (“DOE”) in the above-referenced matter, in which Plaintiffs, parents on behalf of two students, allege that their rights were violated due to alleged systemic delays in providing coordinated nursing and transportation services.

I write respectfully and on behalf of the parties pursuant to the Court’s August 16, 2024 Order (ECF No. 344) to request a one-week extension of the parties’ time, from September 20 to September 27, to file a proposed settlement of all issues but for attorney’s fees. The parties apologize for the lateness of this request (having not complied with Your Honor’s 48 hours rule) and the inconvenience to the Court. As previously reported in their August 9 joint submission, following the settlement conference held in the matter before Magistrate Judge Parker on August 1, 2024, the parties reached a settlement agreement in principle to resolve the remaining money damages claims for both Plaintiffs, exclusive of attorney’s fees and costs. Since that date, the parties have been conferring regarding the terms of the proposed stipulation, but require more time to finalize. The parties remain optimistic they will reach an agreed upon proposed stipulation within a week.

Accordingly, the parties respectfully request that that Court extend the parties’ time to submit a proposed settlement of all remaining issues but for attorney’s fees until September 27.

Thank you for considering this request.

Respectfully submitted,
/s/

Lauren Howland, Esq.
Special Assistant Corporation Counsel

cc: All Counsel of record (via ECF)