



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

JAMES E. JOHNSON  
Corporation Counsel

CHRISTOPHER D. DELUCA  
Senior Counsel  
Phone: (212) 356-3535  
Fax: (212) 356-3509  
Email: cdeLuca@law.nyc.gov

February 27, 2020

**BY ECF AND BY FAX**  
Honorable Naomi R. Buchwald  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Deshawn Gaddy v. City of New York, et al., 17 Civ. 08960 (NRB)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. In that capacity, I write with the consent of plaintiff's counsel, Rose M. Weber, to request an extension of the date to submit a pre-motion conference letter from March 4, 2020 up to and including April 10, 2020. This is the second request for an extension of the date to submit a pre-motion conference letter.

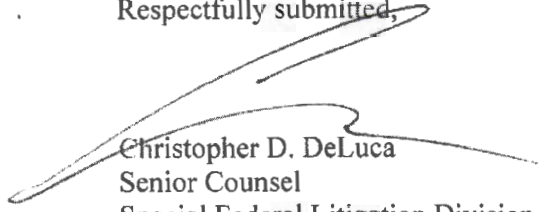
*So Ordered  
FINAL  
EXTENSION*

*Samir  
Buchwald  
LRS  
3/2/20*

On February 6, 2020, plaintiff's counsel, with the consent of the undersigned, requested a sixty day stay of discovery in this matter, to which Your Honor granted a final discovery extension of thirty days. See Docket Entry Nos. 48 and 49. However, based on the current discovery schedule, the deadline to submit a pre-motion conference letter is March 4, 2020, which is during the discovery period. Accordingly, defendants request an extension of the date to submit a pre-motion conference letter from March 4, 2020 up to and including April 10, 2020, a date after the close of the current discovery schedule.

In view of the foregoing, it is respectfully requested that the Court grant the within requests. Thank you for your consideration in this matter.

Respectfully submitted,



Christopher D. DeLuca  
Senior Counsel  
Special Federal Litigation Division

cc: Rose M. Weber, Esq. (By ECF)  
Rose M. Weber Law Office  
Attorney for Plaintiff