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March 20, 2020

**BY ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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KEYONTE SUTHERLAND  
WAYNE WATTLEY

Re: *Jacobs, et al. v. City of New York, et al.*, 18 CV 3275 (VSB)

\*Also Admitted In New Jersey

Your Honor:

I represent plaintiffs in the above-referenced action. I write jointly with defendants to respectfully request a 90-day stay of discovery and associated relief.

If it should please the Court, the parties have worked to complete the exchange of paper discovery, and plaintiffs have forwarded records to a ballistics expert for evaluation. While the parties have worked to minimize disruptions, both the review by plaintiffs' expert and the conduct of depositions have been complicated by the developing COVID-19 pandemic.

The parties have conferred and believe a 90-day stay of discovery is prudent at this time. Accordingly, the parties respectfully request that: 1) the Court enter a discovery stay for 90 days; 2) permit the parties to submit a status letter at the conclusion of that period as to whether a further stay is warranted; and 3) at the conclusion of the stay, permit the parties to submit a jointly proposed discovery plan to govern the remainder of these proceedings.

Thank you for your consideration of this request.

APPLICATION GRANTED

SO ORDERED *Vernon S. Broderick*

VERNON S. BRODERICK

U.S.D.J. 3/24/2020

Respectfully submitted,

*Gabriel P. Harvis*  
Gabriel P. Harvis

The parties shall file a status update by June 30, 2020. The post-discovery conference scheduled for April 3, 2020 is adjourned sine die.