Neufeld Scheck & Brustin, LLP

Tel: [212] 965-9081
Fax: [212] 965-9084

99 Hudson Street, 8th Floor
New York, New York 10013
nsbcivilrights.com

June 1, 2021

<u>Via ECF</u>
Honorable Lorna G. Schofield
United States District Judge
U.S. District Court, Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

The parties' application for an extension of time to file pre-trial submissions is **GRANTED**.

Dated: June 1, 2021
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Rosario v. City of New York, et al.*, Case No. 18-cv-4023

Dear Judge Schofield:

The parties to the above-referenced action respectfully request an extension of time to file pre-trial submissions. When the current deadlines for pre-trial submissions were set, it was expected that trial was likely to begin in the fall of 2021. Now that trial has been set for January 10, 2022, *see* ECF No. 228, both parties would benefit from taking additional time to craft pre-trial submissions in this complex matter.

This is the second request of its kind. The Court previously granted the parties an extension of one month for pretrial submissions. *See* ECF No. 225. The parties do not anticipate that the proposed extension would impact trial plans in any way, given that the final pretrial conference is currently scheduled for December 20, 2021, several months after the latest deadline proposed herein. *See* ECF No. 225.

The parties jointly propose the following schedule:

Pre-Trial Submission	Current Deadline	Proposed New Deadline
Motions In Limine	June 13, 2021	June 24, 2021
Responses to Motions in Limine	June 24, 2021	July 14, 2021
Joint Requests to Charge	June 24, 2021	August 24, 2021
Voir Dire	June 24, 2021	August 24, 2021
Verdict Form	June 24, 2021	August 24, 2021
Pre-Trial Memoranda	June 24, 2021	August 24, 2021
Joint Pre-Trial Order	July 1, 2021	August 24, 2021

Thank you for your consideration of this matter.

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Respectfully submitted,

/s Emma Freudenburger
Emma Freudenburger

Counsel for Plaintiff

Cc: all counsel (via ECF)