



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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September 8, 2021

**BY ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *M.G. obo D.G. v. N.Y. City Dep't of Educ., et al.*  
19 CV 3092 (PAE) (DCF)

Dear Judge Engelmayer,

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York and attorney for the Defendants in the above-referenced action. I write jointly with Plaintiffs' counsel to request a short extension of time to file a proposed stipulation of settlement in this matter.

Pursuant to the Court's Order, dated August 10, 2021, the parties are due to submit a proposed stipulation of settlement by today, September 8, 2021. Since the Court issued its Order, the parties have reached agreement on Plaintiffs' claim for attorneys' fees and costs accrued in this action and in four underlying administrative proceedings. The parties are still engaged in negotiating stipulation and release language, however, and as such, the parties need additional time to memorialize this settlement. To account for the Jewish holidays this week and next, the parties respectfully request that the Court permit them until next Friday, or September 17, 2021, to file the proposed stipulation.<sup>1</sup>

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<sup>1</sup> I acknowledge that in the parties' last status letter, dated August 9, 2021, I stated that I did not expect any further extension would be needed for this purpose. The parties regret the delay in finalizing this agreement.

This is the first request for an extension of this particular deadline, but the Court has previously granted the parties numerous extensions in connection with our efforts to resolve the case. I have communicated with Elisa Hyman, Esq., one of Plaintiffs' attorneys, and indicated above, she joins in this request.

Thank you for your consideration of this matter.

Respectfully submitted,

s/

Andrew J. Rauchberg  
Assistant Corporation Counsel

cc: Elisa Hyman, Esq.  
Erin O'Connor, Esq., Of Counsel  
Law Office of Elisa Hyman P.C.  
Attorneys for Plaintiffs

Granted. SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge  
9/9/21