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September 14, 2022

Via ECF

Hon. Edgardo Ramos
Thurgood Marshall U.S. Courthouse
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Plaintiffs' request for extension is granted. SO ORDERED.
[Signature]
Edgardo Ramos, U.S.D.J
Dated: September 16, 2022
New York, New York

Re: De La Rosa v. Metropolitan Transportation Authority, Case No. 19-cv-4406 (ER)

Dear Judge Ramos:

We and our co-counsel, Sheppard, Mullin, Richter & Hampton LLP, represent Plaintiffs in the above-referenced matter. On June 14, 2022, ECF No. 150, the Court granted the parties' joint request to set September 16, 2022 as the deadline for Plaintiffs to file a motion for class certification for settlement purposes and preliminary approval of the settlement agreement in this action. We write to respectfully request an extension of the deadline to September 27, 2022. This is the first request for an extension of time. Counsel for Transit Defendants and for the City of New York have consented to this request.

While Plaintiffs have completed the briefing for the motion, this request is necessary to allow the parties additional time to confer regarding details of the proposed class notice plan for the settlement.

We thank the Court for its consideration of this request.

Respectfully submitted,

[Signature]

Chloe Holzman
Disability Rights Advocates
Attorney for Plaintiffs

Cc: All counsel of record via ECF