



Muriel Goode-Trufant
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**THE CITY OF NEW YORK
LAW DEPARTMENT**

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March 10, 2025

Via ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Harris v. City of New York*,
20 Civ. 2011 (JPC) (SN)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the City of New York, in the above-referenced action. Defendant respectfully submits this letter in response to the Court's March 7, 2025 Order regarding Defendant's Motion to Compel.

Defendant agrees that the Motion to Compel, filed on March 5, 2025, is now moot. However, Defendant disagrees with Plaintiff's proposed timeline for the extension of expert discovery. Plaintiff provided Defendant with signed HIPAA authorizations for three additional providers after the close of business on March 6, 2025. While these authorizations are being processed expeditiously, this office has no control over when the medical records will be received.

Until those records are obtained, Defendant cannot determine whether to retain an expert, nor can Defendant effectively depose Plaintiff's providers and experts. Additionally, upon receipt of the medical records, Defendant may need to re-depose Plaintiff.

Thank you for the Court's time and consideration.

Respectfully Submitted,



Sonya Gidumal Chazin
Assistant Corporation Counsel

cc: All parties (via ECF)

The City's motion to compel, Dkt. 170, is denied as moot. Counsel for both parties shall appear before the undersigned for a teleconference on March 14, 2025, at 11:00 a.m. to discuss any outstanding discovery issues and necessary deadline extensions. At the scheduled time, counsel for all parties should call (855) 244-8681, access code 2302 755 2307.

Counsel for both parties shall confer prior to the teleconference and, by March 13, 2025 at 5:00 p.m., file a joint letter with the Court identifying (1) what outstanding discovery remains to be taken, (2) proposed deadlines for the completion of discovery or, if necessary, dueling proposals, and (3) whether an extension of the remaining pretrial deadlines in the Court's January 6, 2025 Order, Dkt. 158, is necessary and, if so, a joint proposal for those deadlines. Counsel for Defendant should also be prepared to address what efforts are being undertaken to expeditiously obtain the relevant medical records.

The Clerk of Court is respectfully directed to close Docket Number 170.

SO ORDERED.

Date: March 11, 2025

New York, New York



JOHN P. CRONAN
United States District Judge