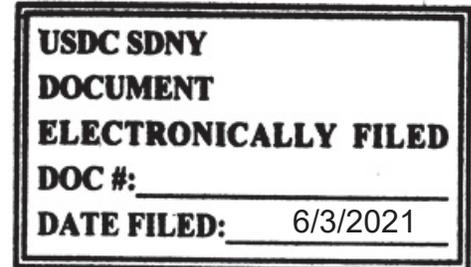


OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

43 West 43rd Street, Suite 131
New York, New York 10036
Phone: 212-725-9800
Facsimile: 212-500-5115

Email: info@osbornlawpc.com
www.osbornlawpc.com



June 2, 2021

VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dimitropoulos v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-08009-LGS-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Hellen Dimitropoulos, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion was due on June 1, 2021. Plaintiff respectfully requests an extension of time up to and including July 31, 2021. This is plaintiff's first request for an extension.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **July 31, 2021**;
- b. Defendant to serve its response/cross-motion on or before **September 29, 2021**; and

Honorable Robert W. Lehrburger
June 2, 2021
Page 2

c. Plaintiff to serve her reply (if any) on or before **September 20, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Peter Jewett, Esq. (by ECF)

Plaintiff's request for an extension comes a day after the due date for submission of its motion has expired. This Court's individual rules require any request for an extension to be made at least 48 hours in advance of the deadline. Counsel is admonished not to overlook this requirement in the future. The request for an extension is granted in part: Plaintiff's motion for judgment on the pleadings must be filed by **July 1, 2021**; Defendant's response/cross-motion must be filed by **August 2, 2021**; Plaintiff's reply, if any, must be filed by **August 23, 2021**.

SO ORDERED:

6/3/2021


HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE