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THE CITY OF NEW YORK
LAW DEPARTMENT

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April 27, 2021

By ECF & Email

Hon. Andrew L. Carter, Jr.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312
ALCarterNYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: *Aaron Singleton v. City of New York et al.*,
20-cv-8570-ALC

Dear Judge Carter:

I am the Assistant Corporation Counsel assigned to represent Defendants City of New York, Office of the Mayor, and New York City Department of Correction Commissioner Cynthia Brann (the “Defendants”) in the above-referenced action. I write to respectfully request a 5-page enlargement of the page limit set forth in Your Honor’s Individual Practices (Rule 2.B), from 25 to 30 pages for Defendants’ motion to dismiss, and a one-week extension of Defendants’ time to file and serve this motion, from April 29 to May 6, 2021.

As Defendants’ motion intends to be fully dispositive of all of Plaintiff’s claims, additional pages are required to fully address Plaintiff’s complaint, which alleges numerous violations of his constitutional rights in connection with the conditions of confinement at Rikers Island (vermin, mattress, access to the law library, COVID-19 precautions, etc.), and deliberate indifference to his medical needs, among other allegations. I also respectfully request a one-week extension of time to file and serve Defendants’ motion, with the additional time requested which will allow me fully and appropriately address Plaintiff’s complaint in its entirety.

This is Defendants’ first request for an extension of time, and extension of pages. Due to Plaintiff’s incarceration, I have not obtained his consent to these requests.

If this request is granted, the briefing schedule, which was ordered on April 1, 2021 (Dkt No. 16) would be modified as follows:

	April 1, 2021 and current schedule	Proposed modified schedule
Defendants' motion	April 29, 2021	May 6, 2021
Plaintiff's opposition	June 10, 2021	June 14, 2021
Defendants' reply	June 18, 2021	June 25, 2021

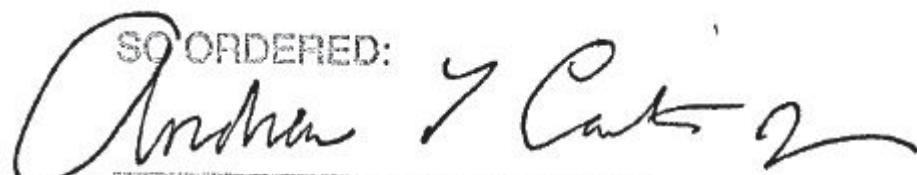
Thank you for your consideration of these requests.

Regards,

/s/
Carolyn E. Kruk

cc: by mail

Aaron Singleton
NYSID: 00424437Q
B&C No. 2411900477
Anna M. Kross Correctional Facility
18-18 Hazen Street
East Elmhurst, NY 11370

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

April 28, 2021

Defendants' request is granted; however, Plaintiff's incarceration is not a sufficient excuse not to obtain Plaintiff's consent. If Defendants seek another extension of time, they must attempt to obtain Plaintiff's consent.