

U.S. Department of Justice



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 10, 2022

By ECF

The Honorable Robert W. Lehrburger
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 1/10/2022

Re: *Thompson v. Social Security Admin., et al.*, 21 Civ. 2034 (RWL)

Dear Judge Lehrburger:

This Office represents the Social Security Administration (“Government”), defendant in this employment-discrimination action brought by *pro se* plaintiff Tiffany Thompson. Pursuant to Section I.F of the Court’s Individual Practices, the Government writes to request a one-week extension to file the parties’ joint letter concerning Plaintiff’s proposed amended complaint and a corresponding one-week extension to the Government’s time to respond to Plaintiff’s instant complaint.

On December 2, 2021, the Government submitted a letter requesting a pre-motion conference concerning its contemplated motion to dismiss. (ECF No. 20.) The Court ordered the parties to meet and confer by January 10, 2022, to discuss whether the issues raised in the Government’s pre-motion letter could be obviated by an amended complaint and to file a joint letter concerning the same. (ECF No. 21.) The Court also extended the Government’s time to respond to Plaintiff’s instant complaint to January 31, 2022. (*Id.*)

On January 4, 2022, Plaintiff provided a proposed amended complaint to the Government; however, the Government needs additional time to evaluate the proposed amended complaint and determine to what extent it remedies the issues identified in the Government’s pre-motion letter and to meet and confer with the Plaintiff concerning the same. Accordingly, the Government requests an extension from January 10, 2022, to January 17, 2022, of the deadline to submit the parties’ joint letter and a corresponding extension from January 31, 2022, to February 7, 2022, of the Government’s time to respond to Plaintiff’s instant complaint.¹

This is the first request for an extension of the above deadlines. Plaintiff’s counsel consents to the Government’s request.

¹ The undersigned apologizes for submitting this request on the Court-ordered date for the parties’ joint letter; the undersigned was outside of the United States last week and not able to submit this request sooner.

We thank the Court for its attention to this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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cc: Plaintiff (by ECF)

SO ORDERED:

1/10/2022
HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE