

U.S. Department of Justice



United States Attorney
Southern District of New York
Civil Division

c/o Social Security Administration tel: (212) 264-2303
Office of the General Counsel fax: (212) 264-6372
26 Federal Plaza, Room 3904 Maria.Fragassi@ssa.gov
New York, New York 10278

May 9, 2022

BY CM/ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Arias v. Comm'r of Soc. Sec.*
1:21-cv-03118-RWL

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 5/9/2022

Dear Judge Lehrburger:

This Office represents Defendant in the above-referenced action. We write respectfully to request an additional second 30-day extension of time for Defendant to file her Cross-Motion for Judgment on the Pleadings and Response to Plaintiff's Motion for Judgment on the Pleadings, currently due on May 18, 2022, to June 17, 2022. The reason for the request is that the Regional Counsel's Office is currently experiencing very heavy workload constraints, and more time is needed to review the record and prepare the Commissioner's response. In addition, the Arias record is over 3,000 pages and the case contains complex issues. This 30-day extension of time will allow the undersigned to have sufficient time to review the record and respond to Plaintiff's motion. This is Defendant's second request for an extension of time to file her cross-motion in this case, and we apologize for any inconvenience to the Court. Plaintiff's counsel, Christopher Bowes, has graciously consented to the Defendant's extension request.

In the event that this motion is granted, Plaintiff's reply brief, which was originally due on May 27, 2022, will be due on June 27, 2022.

We thank this Court for its time and consideration.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: s/Maria Fragassi Santangelo
MARIA FRAGASSI SANTANGELO
Special Assistant United States Attorney
c/o Social Security Administration
26 Federal Plaza, Room 3904
New York, New York 10278
Telephone: 212.264.2303
Fax: 212.264.6372
E-mail: Maria.Fragassi@ssa.gov

cc: Christopher Bowes, Esq.
Via CM/ECF

Granted. No further extensions.

SO ORDERED:

 5/9/2022
HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE