

**MEMO ENDORSED**

**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
 100 CHURCH STREET  
 NEW YORK, N.Y. 10007

**RACHEL SELIGMAN WEISS**  
*Senior Counsel*  
 phone: (212) 356-2422  
 rseligma@law.nyc.gov

July 24, 2024

**VIA ECF**

Hon. Edgardo Ramos  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

The request is granted. The Court adopts the proposed briefing schedule set forth below. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J.

Dated: July 25, 2024  
 New York, New York

Re: Mark Garnes v. the City of New York et al., 22 Civ. 01769 (ER)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel for the City of New York, representing defendants City of New York and Police Officer Nikodomus Petrone in the above-referenced matter. Defendants write to respectfully request a brief, two day extension of time from today until July 26, 2024 for them to file their motion for summary judgment.

By order dated June 26, 2024, Your Honor denied plaintiff's request to amend his complaint to add Officer Outlaw as a defendant in this action. In addition, at that time, Your Honor ordered defendants to file their motion for summary judgment by today, plaintiff to respond by August 21, 2024, and defendants reply to be filed by September 4, 2024.

Despite defendants' best efforts, additional time is needed to complete their motion for summary judgment. This brief extension of time will afford defendants an opportunity to finalize their motion papers and prepare all of the necessary exhibits, including the relevant NYPD body worn camera videos. If Your Honor is inclined to grant this request, defendants propose the following, revised scheduled which has been adjusted by two days:

- Defendants motion to be filed by July 26, 2024;
- Plaintiff's opposition to be filed by August 23, 2024; and
- Defendants reply, if any, to be filed by September 6, 2024.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Rachel Seligman Weiss

Rachel Seligman Weiss

Senior Counsel

cc: Mark Garnes  
Plaintiff *Pro se*  
1205 Atlantic Avenue, Unit 363  
Brooklyn, New York 11216 (by mail)