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MEMO ENDORSED

January 18, 2023

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *R.R. v. New York City Dep't of Educ.*, 22-cv-8182(CM)(OTW)

Dear Judge McMahon:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action in which Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on a trial under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), as well as for this action.

Defendant respectfully requests that the pre-trial conference scheduled for tomorrow per the January 12, 2023 Order (ECF No. 18) be adjourned *sine die*. Plaintiff consents to this request. Yesterday, Defendant telephonically discussed with the Court and gained approval for this late request, and Defendant thanks the Court for accepting this submission. Since the parties' last submissions on January 11 and 12 (ECF Nos. 14-16), the parties have continued to engage in settlement discussions (including today) but have not yet achieved resolution and wish to continue those efforts without further burden on the Court's resources.

Defendant proposes that *in lieu* of a conference, that the parties submit a joint status letter by February 17, 2023, advising the Court on the status of settlement negotiations. We note that Defendant has resolved all but three of the many dozens of similar IDEA fees-only cases brought by plaintiffs represented by the Roller Firm without the need for motion practice, and expect this case to take that same course.

Thank you for considering these requests.

Respectfully submitted,

/s/

Lauren Howland
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

Conference adjourned.
Sine die.
Colleen McMahon
1/18/2023