

CYRUS JOUBIN, ESQ.
43 West 43rd Street, Suite 119 – New York, NY 10036
347-223-4296 (office); 703-851-2467 (cell)
718-228-7679 (fax)
joubinlaw@gmail.com

September 23, 2024

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Dashaun Outlaw v. City of New York, et al., 22 CV 9288 (PAE)

Dear Judge Engelmayer:

As Plaintiff's counsel in this matter, I respectfully write on behalf of the parties to request a brief extension of the parties' motion papers with respect to Plaintiff's motion to amend his complaint. *See* ECF No. 36 (September 18, 2024 Order setting forth due dates of September 25 and October 3 for Plaintiff's motion and Defendant's opposition, respectively). The reason for this request is that Plaintiff intends to cite the deposition transcripts of two NYPD detectives who were part of the December 31, 2021 Regional Fugitive Task Force operation in 2101 Madison Avenue, and counsel for the United States Marshal's Service ("USMS"), Jeffrey Oestericher, wishes to review, and possibly request redactions to, the portions of those transcripts that Plaintiff cites or annexes to his motion papers. Accordingly, counsel for the parties conferred this afternoon with Mr. Oestericher and agreed upon the following schedule.

- Plaintiff's counsel Cyrus Joubin to provide a finalized version of his Declaration and annexed exhibits to Mr. Oestericher by Wednesday, September 25, 2024 at 9:00 a.m.
- Mr. Oestericher to provide Plaintiff with all redactions to the Joubin Declaration and annexed exhibits by Friday, September 27, 2024, at 5:00 p.m.
- Plaintiff to file all motion papers by the end of the day on Friday, September 27, 2024.
- Defendant's opposition is due October 7, 2024.

This is the parties' first request for an extension of the deadlines with respect to the motion to amend.

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,



Cyrus Joubin, Esq.
Attorney for Plaintiff

cc: Bailey Forcier, Esq.
Attorney for Defendants

Granted.
SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
September 23, 2024