



THE CITY OF NEW YORK  
LAW DEPARTMENT  
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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3-12-25

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March 11, 2025

**By ECF**

Honorable Lewis A. Kaplan  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Jose Rodriguez v. City of New York, 23-CV-05531 (LAK) (OTW)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, counsel for defendant City of New York in this action. Defendant writes to respectfully request a two week extension of time to file its objections to Your Honor's Report and Recommendation, filed on March 4, 2025 (ECF No. 62), regarding defendant's motion to dismiss pursuant to Fed. R. Civ. P. 12(c), from March 18, 2025 to April 1, 2025. This is the first such request, to which plaintiff consents. This request is made in light of the undersigned's prescheduled vacation from March 12, 2025 to March 17, 2025. This request will not impact any other deadlines in this matter.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ John Schemitsch

John Schemitsch

cc: **Via ECF**  
All Counsel of Record

Granted  
SO ORDERED  
Lewis A. Kaplan  
LEWIS A. KAPLAN /USDJ  
3/12/2025