

**MEMO ENDORSED**



**HON. SYLVIA O. HINDS-RADIX**  
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November 7, 2023

**VIA ECF**

Honorable Jessica G. L. Clarke  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Anacelis Martinez, as the parent and natural guardian of A.J. (a minor) v. City of New York et al., 23-CV-6303 (JGLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced matter. In that capacity, I write on behalf of the parties, in accordance with the Court's October 17, 2023 Order.

First, the parties have conferred and are amenable to discussing settlement and respectfully request the Court to refer the matter to a Magistrate Judge. Second, the parties respectfully request one additional week to provide the Court with a proposed protective order. While the parties have met and conferred regarding the proposed protective order and are in agreement on a large portion of the stipulation, a limited number of items remain outstanding. The parties believe the additional time will allow them to reconcile any issues and to avoid the need for Court intervention.

Accordingly, the parties respectfully request that the Court refer the matter to a Magistrate Judge for settlement purposes and to grant a one-week extension of time to provide the Court with a proposed protective order from November 7, 2023 until November 14, 2023.

**Application GRANTED.** The parties' deadline to submit a proposed protective order is extended to **November 14, 2023**. The Court will refer the matter to Magistrate Judge Willis for settlement purposes. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 29.

Dated: November 13, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke".

JESSICA G. L. CLARKE  
United States District Judge

Thank you for your consideration herein.

Respectfully submitted on behalf of the  
parties,

/s/

Joseph Zangrilli  
*Senior Counsel*

Cc: Joshua Moskovitz, Esq. (*Via ECF*)  
Brian Buckmire, Esq. (*Via ECF*)  
Calla Ketchens, Esq. (*Via ECF*)