

**U.S. Department of Justice**

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

November 13, 2023

BY ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Maritime Legal Solutions v. U.S. Transp. Command*, No. 23 Civ. 7045 (KPF)

Dear Judge Failla:

This Office represents defendant the United States Transportation Command in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). I write respectfully, together with the plaintiff, to request that the initial pretrial conference presently scheduled for tomorrow November 14, 2023, be rescheduled to the week of November 27, 2023, or a time thereafter that is convenient for the Court, with a corresponding extension of time for the parties' preconference submissions.

This is the first request by either party to adjourn the conference. The parties apologize for any inconvenience to the Court in not making this request 48 hours in advance. Three weeks ago, defendant responded to the FOIA request and made a production. In the interest of efficiency, the requested adjournment will allow the parties to continue their discussion regarding plaintiff's concerns with the production and confer regarding next steps in advance of the conference. The parties thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

By: /s/ Joseph A. Pantoja

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cc: *Counsel of record* (by ECF)

Application GRANTED. The conference scheduled for November 14, 2023 is hereby ADJOURNED to **November 29, 2023**, at **10:00 a.m.** The dial-in information for the conference remains the same, and is as follows: At the scheduled date and time, the parties are to call (888) 363-4749 and enter access code 5123533.

The Court trusts that the parties will timely file their joint pre-conference submission and proposed case management plan on or before **November 23, 2023**, or will promptly seek an adjournment should such additional time prove useful to the parties in reaching a negotiated resolution.

The Clerk of Court is directed to terminate the pending motion at docket number 13.

Dated: November 13, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE