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March 25, 2024

VIA ECF

Hon. Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Denise L. Cote
Denise Cote
3/26/24

Re: *M.N. et. al. v. New York City Department of Education*
23-cv-07791 (DLC)

Dear Judge Cote:

Please be advised that this firm represents the Plaintiffs in the above action. Plaintiffs brought this action seeking attorneys' fees, costs and expenses pursuant to the fee shifting provision of the Individual with Disabilities Education Act, 20 U.S.C. §1400, et. seq. wherein Plaintiffs were successful in the underlying trials, as well as for this action.

Plaintiffs respectfully submit this letter motion requesting an extension of time to submit their Motion for Summary Judgment currently due on March 29, 2024 per the Court's January 4, 2024 Pretrial Scheduling Order (Dkt. No. 15). This is Plaintiffs' first request for an extension of time to submit their Motion for Summary Judgment and Defendant consents to this request. At this time, the parties are engaged in settlement discussions, the adjournment would allow the parties to continue negotiating.

The parties propose the following amended briefing schedule:

- Plaintiffs' Motion for Summary Judgment due on April 23, 2024
- Defendant's Opposition due on May 23, 2024
- Plaintiffs' Reply due on July 11, 2024

I thank you in advance for the Court's consideration of this request.

Respectfully submitted,

s/

Irina Roller
Attorneys for the Plaintiff

cc: Vivian Drohan, Esq., *Attorneys for the Defendant*