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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FIORDLAIZA CRUZ,                               :
                                                :  NOTICE OF
                                                :  FOR ATTORNEYS FEES
                Plaintiff,                       :  PURSUANT TO
                                                :  28 U.S.C. § 2412
                                                :
                -against-                       :  1:24 Civ. 823 (JPO) (VF)
                                                :
MARTIN J. O'MALLEY,                             :
COMMISSIONER OF SOCIAL SECURITY,                 :
                                                :
                Defendant.                     :
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PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher James Bowes, dated October 23, 2024, plaintiff will move this Court before Honorable J. Paul Oetken, United States District Judge presiding, at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, new York 10007, on submission, for an order, on submission, for an order:

(1) Accepting plaintiff's application for reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act ("EAJA"), 28 U.S.C. §2412(d), as timely filed; and

(2) Granting plaintiff leave to defer filing a memorandum of law in support of her application for fees for a period of 60

days to permit the parties an opportunity to reach settlement of the fee issue; and

(3) for such other and further relief as this Court may deem just and proper.

Dated: Shoreham, New York
November 21, 2024

MEMO ENDORSED



**HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE**

Dated: 11/22/24

Plaintiff's extension request is GRANTED. Plaintiff is directed to file a memorandum of law in support of the motion by **January 21, 2025** if the parties are unable to reach an agreement.

Respectfully submitted,

/s/Christopher James Bowes

CHRISTOPHER JAMES BOWES, ESQ.

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