

MEMO ENDORSED.

Drohan Lee

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Application **GRANTED**. The Preliminary Settlement Conference Call is adjourned to **October 17, 2024, at 4:00 p.m.**

September 24, 2024

VIA ECFHon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007**SO ORDERED.**

Ona T. Wang Sept. 25, 2024
U.S.M.J.

Re: *Z.S. et al. v. N.Y.C. Dep't of Educ.*, 24-cv-1441 (MMG)(OTW)

Dear Magistrate Judge Wang:

We represent Defendant in the above-referenced action wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request the adjournment of the Pre-Settlement Conference Call ("Conference") scheduled for October 1, 2024, before Your Honor, to October 17, 2024, or to a future date convenient to the Court. If October 17, 2024, is unavailable, I respectfully inform the Court that I will be out of the country from October 25 to November 8, 2024, and Plaintiffs' counsel will be away from October 22, 2024, to October 27, 2024, but we would be available to attend the Conference thereafter at the Court's convenience. Plaintiffs consent to this request.

This is the third and final request for an adjournment of the Conference. During our review of the administrative record for settlement purposes, Defendant identified the need for additional documents, which Plaintiffs' counsel is in the process of providing. Upon receipt of these records, Defendant anticipates being in a position to extend a settlement offer, at which point the parties will begin settlement negotiations. Given these circumstances, Defendant believes that a Conference would not be beneficial at this time so as to avoid the utilization of court resources.

Accordingly, Defendant respectfully requests that the Court adjourn the Conference to October 17, 2024, or to a future date convenient to the Court. Thank you for considering this request.

Respectfully Submitted,

/s/ Vivian Rivera Drohan
Vivian Rivera Drohan, Esq.

cc: Michele Kule-Korgood, Esq. (via ECF)