P.A. et al v. New York City Department of Education et al Doc. 17

Law Offices of Irina Roller, PLLC

40 Wall Street
New York, New York 10005

Telephone (212) 688-1100
Facsimile (212) 706-9362
Email: Hearings@RollerEsq.com

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VIA ECF

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Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *P.A.. et. al. v. New York City Department of Education, et al.*
1:24-cv-04544 (CM)(BCM)

Dear Judge McMahon:

MEMO ENDORSED

Please be advised that this firm represents the Plaintiffs in the above action. Plaintiffs brought this action seeking enforcement of an underlying Order as well as attorneys' fees, costs and expenses for legal work on multiple cases under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. (IDEA), as well as for this action.

The parties jointly respectfully requests a 90-day stay of this action, including the in-person Initial Pretrial Conference currently scheduled for September 26, 2024 at 10:30 a.m. (ECF 8), the submission of a joint status letter by October 1, 2024 (ECF 13) and the Motion for Summary Judgment due by October 24, 2024 (ECF 13). This is the parties' first request for a stay.

The requested stay will allow the parties to continue settlement negotiations and hopefully resolve this matter without the need for a conference or motion practice.

If a stay is granted, the parties proposes the submission of a joint status letter on or before December 23, 2024 updating the Court on the status of settlement negotiations.

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

Respectfully submitted,

s/
Irina Roller
Attorneys for the Plaintiff

cc: All counsel for Defendant via ECF

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