



288 NORTH PLANK ROAD, NEWBURGH, NY 12550

PHONE: (845) 566-4400 · FAX: (845) 569-0111 · TOLL FREE: (800) 610-4401 · (888) 2SSD-SSI

WEB SITE: WWW.DENNISKENNYLAW.COM · E-MAIL: DENNISKENNYLAW@CS.COM

DENNIS KENNY, Esq. (NY & P^A)

KATHERINE M. USEWICZ, Esq.

JEFFREY C. LEO, Esq.

SCOTT T. BLACK, Esq. (NY & CA)

EDWARD C. DELAUTER, Esq.

TARA L. JOHNSSON, Esq. (FL)

JOSEPHINE GOTTESMAN Esq.

OF COUNSEL

EVAN M. FOULKE, Esq. (NY & NJ)

GREGORY M. SOBO, Esq.

VIA ECF

March 10, 2025

Hon. Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007

SO ORDERED:

03/10/2025

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

RE: Alvarado v. Commissioner SSA

24- CV- 09197 (LGS) (RWL)

Dear Judge Lehrburger:

This office represents Plaintiff in the above-referenced Social Security appeal.

Plaintiff's motion and brief in this case are due to be filed on 3/12/25. We write respectfully to request an extension of time in which to file Plaintiff's motion and memorandum of law. My husband was admitted to the hospital last evening pending possible heart surgery. In view of this, Plaintiff respectfully requests an extension of 3 weeks' time in which to file her motion. Should the Court grant this request, Plaintiff's motion and brief will be due on 4/2/25. The parties also jointly request that Defendant's opposition papers be due on June 2, 2025, and Plaintiff's reply, if any, be due on June 16, 2025.

This is the first time such relief has been requested in this matter. Commissioner's Counsel has graciously consented to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ JOSEPHINE GOTTESMAN

Cc: Fergus Kaiser, Esq. (VIA ECF).

ADDITIONAL OFFICES AT:

55 MAIN STREET, GOSHEN, NY | 3344 ROUTE 9 NORTH, 1ST FLOOR, POUGHKEEPSIE, NY | 18 COMPUTER DRIVE WEST, SUITE 109, ALBANY, NY

THE FIRM RESERVES THE RIGHT TO ASSIGN ALL MATTERS TO ANY MEMBER OR ASSOCIATE ATTORNEY