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Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com
Paul J. Kremer
Direct: +1 212.351.2647
Fax: +1 212.351.6247
PKremer@gibsondunn.com

August 31, 2022

MEMO ENDORSED

VIA CM/ECF
Hon. Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Plaintiff's request for an extension, with consent from Defendants, is GRANTED. Plaintiff's cross-motion and opposition papers shall be served on Nov. 8, 2022; Defendants' reply and cross-opposition papers shall be served on Dec. 11, 2022; and Plaintiff's cross-reply shall be served on Jan. 7, 2023. All motion papers shall be filed on Jan. 7, 2023. The Clerk of Court is kindly directed to terminate the motion at ECF No. 258.

SO ORDERED:

Re: Booker v. Griffin, et al., 16 Civ. 72 (NSR) (PED)

DATED: September 1, 2022
White Plains, NY

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

We write as counsel for DOCCS inmate Amin Booker, the plaintiff in the above-captioned action. Mr. Booker respectfully requests a 60-day adjournment of the deadline for filing an opposition to Defendants' pending motion for summary judgment, as well as the deadline for Mr. Booker's anticipated cross-motion. We make this request because delays and logistical challenges faced by Mr. Booker's current facility, Great Meadow, have made it difficult for us to effectively communicate with our client. Most recently, a pre-scheduled August 23 call with Mr. Booker was abruptly cut short because the Great Meadow facility had an unexpected scheduling conflict. Additionally, on August 26 and August 30, the facility received legal mail from us, but failed to distribute the mail to Mr. Booker in advance of our pre-scheduled August 30 call. As a result, we have not been able to complete important conversations about his upcoming filings. We appreciate that Great Meadow faces significant resource constraints, and we continue to work with facility administrators to ensure that Mr. Booker's mail is delivered and that adequate call time is scheduled. In light of these challenges, however, we respectfully request additional time to complete our filings.

We have conferred with Defendants' counsel and he has consented to our adjournment request. If the Court grants our request, the deadlines will be adjusted as follows: (i) Plaintiff's cross-motion and opposition papers shall be served not filed on November 8, 2022, (ii) Defendants' reply and cross-opposition papers shall be served not filed on December 11, 2022, and (iii) Plaintiff's cross-reply papers shall be served on January 7, 2023, with all motion papers to be filed that day. We thank the Court for its consideration of our request.

Respectfully submitted,

[Signature]
Paul J. Kremer

cc: Counsel of record (via CM/ECF)