

PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher James Bowes, dated February 3, 2020, plaintiff will move this Court before the Honorable Lisa M. Smith, United States Magistrate Judge presiding, at the United States Courthouse, Southern District of New York, 300 Quarropas Street, White Plains Pearl Street, White Plains, New York 10601, 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 his application for fees for a period of 60