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March 27, 2023

By ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10606

Re: Haughey v. The County of Putnam, et al, 18 CV 2861 (KMK)

Dear Judge Karas:

I represent Plaintiff Richard J. Haughey, the administrator of the Estate of William J. Haughey in this 42 U.S.C. § 1983 action. This letter is filed as a motion to extend the time for the parties to file a Joint Pretrial Order with attendant documents.

This is the second request for extension of time to file this material. The JPTO was originally due on February 24, 2023 and the Court granted an extension to March 30, 2023. I was engaged in a seven-week jury trial in the matter of *People v. Andrew Krivak* which ended with an acquittal on February 27, 2023; for that period of time I resided in an apartment in Danbury CT to be close to the trial proceedings. I then had a scheduled vacation that took me out of the country until March 10, 2023, and then had to immediately engage in the matter of *People v. Emel McDowell* which resulted in Mr. McDowell's conviction being vacated and his being fully exonerated with the consent of the Kings County District Attorney's Office on March 16, 2023.

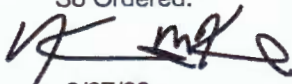
Those matters occupied all available time and I was just not able to finalize the JPTO in time as I also had to address my being out of my office for over seven weeks. I have no other similarly time-consuming matters between now and the proposed date of April 28, 2023, so I anticipate having no issues with timely complying with the extension if granted.

All defendants except Mr. Porto consent to the adjournment and the date of April 28, 2023. I have not heard from Mr. Porto; his email address is no longer functioning, and he did not respond to letters I previously mailed to the address we have for him.

Thank you for your attention in this matter.

Granted.

So Ordered.



3/27/23

Respectfully submitted,

s/Oscar Michelen

Oscar Michelen

cc: All defense counsel by ECF