



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

November 26, 2024

**By ECF**

Honorable Cathy Seibel  
United States District Judge  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601

Pre-motion letters regarding summary judgment due 1/6/25.

SO ORDERED.

*Cathy Seibel*  
CATHY SEIBEL, U.S.D.J.

11/26/24

**Re: *M.G. v. Cuomo*, 19-cv-0639 (CS) (AEK)  
Joint Request for Extension of Pre-Summary Judgment Letter Deadline**

Dear Judge Seibel:

The parties write jointly to provide an update on the status of this matter and to respectfully request a 30-day extension of the summary judgment pre-motion letter deadline.

As of November 22, 2024, the parties completed fact and expert discovery pursuant to the case management schedule set by Magistrate Judge Krause (ECF No. 378).<sup>1</sup> The case management schedule calls for summary judgment pre-motion letters to be filed, pursuant to Your Honor's Individual Rules, by Friday, December 6, 2024.

On October 16, 2024, the parties attended a settlement conference with Magistrate Judge Krause. Following that conference, the parties have continued to discuss the possibility of settlement. Earlier today, the parties sent Magistrate Judge Krause a joint status report regarding the status of settlement discussions.

The parties jointly request that the summary judgment pre-motion letter deadline be extended 30 days, to January 6, 2025, in order to give space for the parties to continue to assess the possibility of a settlement. This is the first request for an extension of the summary judgment pre-motion letter deadline (although this deadline has previously been moved multiple times as part of global adjustments to the case management schedule). The requested extension would not affect any other scheduled dates.

The parties thank Your Honor for your time and attention to this request.

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<sup>1</sup> Subject to one request by Defendants for a document (or documents) mentioned in the deposition testimony of Plaintiffs' proposed expert Melodie Peet. Defendants followed up in writing on November 20, 2024, to request the document(s), and Plaintiffs have informed Defendants that they will respond to Defendants' request.

Respectfully submitted,

/s/ Owen T. Conroy \_\_\_\_\_

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DISABILITY RIGHTS NEW YORK

/s/ Elizabeth Woods \_\_\_\_\_

Elizabeth Woods

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