MEMO ENDORSED

CHRISTOPHER JAMES BOWES, ESQ 54 Cobblestone Drive Shoreham, New York 11786

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CJB-8865

Attorney for Plaintiff

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DATE FILED: 03/27/2024

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LISA LIEBERMAN, : NOTICE OF

FOR ATTORNEYS FEES

Plaintiff, : PURSUANT TO

28 U.S.C. § 2412

-against-

7:19 Civ.2870 (NSR) (AEK)

:

MARTIN J. O'MALLEY,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

----X

PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher James Bowes, dated March 23, 2024, plaintiff will move this Court before Honorable Nelson S. Roman, United States District Court Judge presiding, at the United States Courthouse, Southern District of New York, 300 Quarropas Street, White Plains, New York, on submission, for an order, 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 her application for fees for a period of 60

days to permit the parties an opportunity to reach settlement of the fee issue; and

(3) for such other and further relief as this Court may deem just and proper.

Dated: Shoreham, New York March 23, 2024

Respectfully submitted,

/s/Christopher James Bowes

CHRISTOPHER JAMES BOWES, ESQ. 54 Cobblestone Drive Shoreham, New York 11786

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Attorney for Plaintiff

To: Elizabeth Kim, Esq.
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86 Chambers Street, 3<sup>rd</sup> Floor
New York, NY 10007
Attorneys for Defendant

Plaintiff's request is GRANTED. Plaintiff shall file her memorandum of law in support of her application for fees on or before May 26, 2024. The Commissioner shall file a response to Plaintiff's motion on or before June 17, 2024. The Clerk of the Court is directed to terminate the motion at ECF No. 45.

SO ORDERED:

Dated: March 27, 2024 White Plains, NY

HON NELSON S. ROMAN UNITED STATES DISTRICT JUDGE