

Schoolcraft v. The City Of New York et al

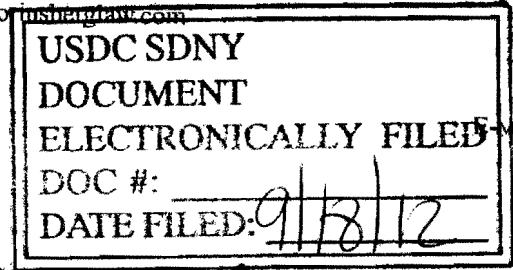
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September 11, 2012

Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007



Re: Schoolcraft v. City of New York, et al
10 CV 6005 (RWS)

Your Honor:

I am one of the attorneys representing plaintiff Adrian Schoolcraft in the above referenced civil rights action brought pursuant to 42 U.S.C. § 1983. I write now to respectfully request a 120-day extension of the discovery deadline, from September 12, 2012 to January 12, 2013. This is the first request for an extension of discovery. Counsel for all defendants consent to this request.

There are several reasons for this request. First, while the parties have worked in good faith to resolve potential discovery disputes, there remains one issue with respect to the proposed confidentiality order. The parties are hopeful to resolve this issue without the Court's intervention. In the interim, however, this issue has prevented the parties from completing documentary discovery, and moving forward with depositions. In addition, the parties have been engaged in extensive motion practice over plaintiff's First Amendment claims and the subpoena served on Councilman Vallone, which has also prevented the parties from moving forward with discovery. Lastly, plaintiffs' attorneys have been on trial in five separate matters from April 2012 to the present time, which has also contributed to delays in discovery.

For all of the foregoing reasons, plaintiff respectfully requests that the Court extend the current discovery deadline for 120 days, from September 12, 2012 to January 12, 2013. I thank the Court for consideration of this request.

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Sonder Sweet TVSD
9-14-12

Respectfully submitted,

Jon L. Norinsberg

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cc:

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