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May 25, 2014

VIA ECF

Honorable Judge Robert W. Sweet
United States District Court Judge
United States District Court Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: The New York State Rifle & Pistol Association, et al. v. The City of New York, et al., 13 Civ. 2115 (RWS) (S.D.N.Y.)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants, the City of New York and the New York City Police Department License Division, in the above-referenced action. I write to request a brief adjournment and adjustment, on consent, of the briefing schedule for defendants' opposition to plaintiffs' motion for a preliminary injunction and cross-motion for summary judgment, from the dates discussed at the conference with the Court on March 19, 2014. In addition, I write to request permission to submit up to five (5) additional pages in defendants' memorandum of law to be submitted, from the twenty five page limit set forth in this Court's Individual Rules of Practice.

Under the current schedule, defendants' motion papers are due to be served and filed on May 29, 2014, plaintiffs have until July 31, 2014 to oppose defendants' cross-motion and submit reply on its preliminary injunction motion, defendants have until August 14, 2014 to submit reply in further support of the cross-motion for summary judgment, plaintiffs have until August 28, 2014 for reply in the event that plaintiffs cross-move for summary judgment, and argument is scheduled for September 17, 2014. I have reached out to Brian Stapleton, Esq., counsel for plaintiffs, and he has consented to the following extension of the initial briefing schedule and

adjustment of the other dates: defendants have until on or before June 5, 2014 to serve and file opposition papers to plaintiffs' motion and cross-move to summary judgment; plaintiffs will have until July 15, 2014 for opposition to defendants' cross-motion for summary judgment, and to cross-move for summary judgment on behalf of plaintiffs; defendants will have until August 8, 2014 for opposition to the cross-motion and reply in further support of defendants' cross-motion, and plaintiffs shall have until August 22, 2014 for reply to any cross-motion for summary judgment they may make. The papers will thus be fully-submitted on August 22, 2014. Oral argument will remain as scheduled on September 17, 2014 or whenever convenient thereafter for the Court. This is defendants' first request for an extension and adjustment on the briefing schedule, and plaintiffs have consented.

In addition, because defendants will be briefing their cross-motion for summary judgment and opposition to plaintiffs' motion for a preliminary injunction in a single memorandum of law, defendants respectfully request permission to submit an additional five pages in their memorandum of law. Plaintiffs have consented to this request. Defendants will of course consent to a similar application for plaintiffs for their initial memorandum as well. This is defendants first request for leave of the Court for an additional five pages in their memorandum of law.

Respectfully submitted,



Michelle Goldberg-Cahn
Assistant Corporation Counsel

cc: Brian T. Stapleton, Esq., Goldberg & Segalla, LLP – Counsel for Plaintiffs (via ECF)