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ZACHARY W. CARTER  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

Suzanna Publicker Methman  
Assistant Corporation Counsel  
phone: (212) 356-2372  
fax: (212) 788-9776  
smethman@law.nyc.gov

**BY HAND DELIVERY & FAX**

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

CC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
3-5-14

March 3, 2014

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

Your Honor:

I am the Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent City Defendants in the above-referenced matter. I write today to request that the City be granted until Friday, March 7, 2014 to reply in further support of City Defendants' motion dated February 18, 2014. This enlargement is due to the fact that plaintiff has raised new issues in his February 28, 2014 opposition that City Defendants must address for the first time. Plaintiff's counsel objects to this request, because he believes that there will be a Court conference this Wednesday, March 5, 2014 at which time the matters will be addressed. City Defendants are unaware of any such conference, and ask that any such conference be held in abeyance until the matters may be fully briefed.

City Defendants filed a letter motion seeking a Rule 37 conference regarding plaintiff's improper discovery requests on February 18, 2014. According to Local Rule 6.1, plaintiff's response was due on February 25, 2014. On February 27, 2014, plaintiff belatedly filed a motion for an extension of time to respond to that motion, though he never sought counsel's consent for the enlargement. Plaintiff filed his opposition on February 28, 2014. City Defendants' reply to such opposition is due within two days of service thereof, or March 4, 2014. The opposition drafted by plaintiff contains a number of significant new discovery issues, which were not raised in City Defendants' February 18, 2014 letter motion. Therefore, City Defendants request an enlargement until Friday, March 7, 2014 to provide a reply in further support of City Defendants' February 18, 2014 letter motion, and oppose new allegations raised in plaintiff's February 28, 2014 letter motion.

*Extension to reply to March 7  
granted. Motion to be heard  
March 13  
So ordered  
Sweet  
USDJ  
3-4-14*

City Defendants thank the Court for its consideration of this request.

Respectfully submitted,

Suzanna Publicker Mettham  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Nathaniel Smith (By Fax)  
*Attorney for Plaintiff*

Gregory John Radomiski (By Fax)  
MARTIN CLEARWATER & BELL LLP  
*Attorneys for Jamaica Hospital Medical Center*

Brian Lee (By Fax)  
IVONE, DEVINE & JENSEN, I.L.P.  
*Attorneys for Dr. Isak Isakov*

Bruce M. Brady (By Fax)  
CALLAN, KOSTER, BRADY & BRENNAN, I.L.P.  
*Attorneys for Lillian Aldana-Bernier*

Walter A. Kretz, Jr. (By Fax)  
SCOPPETTA SEIFF KRETZ & ABERCROMBIE  
*Attorney for Defendant Mauriello*