

THE CITY OF NEW YORK
LAW DEPARTMENT

MICHAEL A. CARDOZO
Corporation Counsel

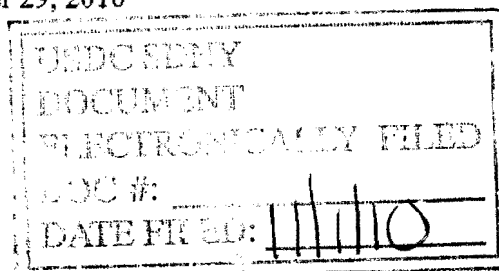
100 CHURCH STREET
NEW YORK, NY 10007

DONNA A. CANFIELD
Assistant Corporation Counsel
phone: (212) 788-8703
fax: (212) 788-8877*
mobile: (917) 573-3480
email: dcanfiel@law.nyc.gov

October 29, 2010

BY FACSIMILE: 212-805-7925

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



Re: Schoolcraft v. The City of New York, et al.
Civil Action Number: 10 CV 6005
LM #: 2010-033074

Dear Judge Sweet:

I am the Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the City of New York and the New York City Police Department ("NYPD") (collectively the "City defendants") in the above-referenced matter. I write, with the consent of plaintiff's counsel, to request an additional thirty (30) day extension of time to answer or otherwise respond to plaintiff's Amended Complaint, from November 2, 2010 to December 2, 2010. This is City defendants' second request for an enlargement of time to respond to the Amended Complaint.

Plaintiff, a former police officer with the NYPD, brings this action pursuant to 42 U.S.C. § 1983 and 42 U.S.C. § 1988 for violations of his First, Fourth, and Fourteenth Amendment rights, and under New York State tort law against the City defendants, ten (10) individually-named members of the NYPD, and fifty (50) individual members of the NYPD identified only as "John Doe." Although City defendants are actively investigating plaintiff's claims alleged in the Amended Complaint, it has been determined that an additional thirty (30) days are necessary to complete our investigation/interviews of all members of the NYPD named in the Amended Complaint, determine the scope of representation, and prepare an appropriate response to the Amended Complaint.

*S. Cardozo
Deane T 4505
11.1.10*

For these reasons, City defendants respectfully request a further extension of time to answer or otherwise respond to plaintiff's Complaint until December 2, 2010.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Donna A. Canfield
Assistant Corporation Counsel
dcanfiel@law.nyc.gov

cc: Jon L. Norinsberg
Attorney for Plaintiff
225 Broadway, Suite 2700
New York, New York 10007
(by email: Norinsberg@aol.com)

Cohen & Fitch, LLP
Gerald Cohen
Joshua Fitch
Attorneys for Plaintiff
225 Broadway, Suite 2700
New York, New York 10007
(by email: gcohen@cihenfitch.com; jfitch@cohenfitch.com)

Gregory John Radomisli
Martin Clearwater & Bell LLP (NYC)
Attorneys for Jamaica Hospital
220 East 42nd Street
13th Floor
New York, NY 10017
(by email: radomg@mcblaw.com)

Brian E Lee
Law Office of J. David O'Brien
Attorneys for Dr. Isak Isakov
20 Vesey Street
Suite 1210
New York, NY 10007
(by email: blee@idjlaw.com)

Bruce Morgan Brady
Wilson Elser Moskowitz Edelman & Dicker LLP
Attorneys for Dr. Lillian Aldana-Bernier
150 East 42nd Street

New York, NY 10017
(by email: bbrady@ckbbllaw.com)