



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

ZACHARY W. CARTER  
*Corporation Counsel*

MICHELLE GOLDBERG-CAHN  
*Deputy Chief, Administrative Law Division*  
phone: 212-356-2199  
email: migoldbe@law.nyc.gov

February 25, 2019

**By ECF and Hand Delivery**

The Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Schwartz v. City of New York, et al., 19 CV 463 (RJD)

Your Honor:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for the defendants in the above-referenced action. I write to respectfully request an extension of the Defendants' time to answer or otherwise respond to the Complaint until 30 days after the Court rules on the Plaintiff's Motion for a Preliminary Injunction.<sup>1</sup> Defendants' answer is currently due on February 28, 2019, and this is the first request for an extension. Plaintiff has consented to this request.

Thank you for your attention to this matter.

Respectfully submitted,

  
Michelle Goldberg-Cahn  
Assistant Corporation Counsel

cc: Roger Brooks, Esq. – Counsel for Plaintiff (via ECF)

---

<sup>1</sup> Plaintiff served defendants his motion for a preliminary injunction last week and the parties have worked out a briefing schedule for that motion (plaintiff is expected to file a letter setting forth the agreed-upon schedule).