



September 29, 2020

Via ECF

Honorable Mae A. D'Agostino
United States District Judge
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Suite 509
Albany, NY 12207

Re: *New Hope Family Services, Inc. v. Poole*
Northern District of New York
Case No. 5:18-cv-01419-MAD-TWD

Dear Judge D'Agostino:

Plaintiff respectfully requests that this Court schedule oral argument on Plaintiff's renewed motion for preliminary injunction.

In its order dated July 21, 2020, the Court of Appeals vacated this Court's prior judgment "insofar as it denied New Hope's motion for a preliminary injunction" as moot, and remanded "for further proceedings consistent with this opinion." Recognizing the urgency of New Hope's request for alleviation of certain restrictions contained in the "limited injunction" earlier entered by the Court of Appeals, and in order to facilitate "prompt review," that court ordered that "any party wishing to supplement its initial preliminary injunction filings in the district court [shall] do so within ten days of the issuance of this court's mandate." *See New Hope Family Services, Inc. v. Poole*, 966 F.3d 145, 184 (2d Cir. 2020).

Pursuant to this Court's order of August 19, 2020, both parties completed such supplemental filings on August 28, 2020. Accordingly, Plaintiff respectfully requests that if the

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Court desires oral argument on New Hope's motion for preliminary injunction, it schedule that argument at an early date, in order to enable a "prompt review" and decision of Plaintiff's motion.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2020, I electronically filed the foregoing letter request using the CM/ECF system. Service on counsel for all parties will be accomplished through the Court's electronic filing system.

s/ Roger G. Brooks _____
Attorney for Plaintiff