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September 11, 2017

Via ECF and Facsimile: (212) 805-7942

Hon. Alvin K. Hellerstein
United States District Courthouse
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

Re: *Washington, et. al. v. Sessions, et. al., 17-cv-05625 (AKH)*

Dear Judge Hellerstein:

As Your Honor may recall, during the September 8, 2017 hearing on Plaintiffs' Order to Show Cause in the above-referenced case, Your Honor directed the parties to submit to the Court, a joint-letter detailing a proposed discovery schedule by today, September 11, 2017 ("Scheduling Order") unless additional time became necessary, in which such instance, the parties were directed to request an extension by letter. As explained below, we write to request the extension referenced by the Court during the hearing.

Michael Hiller, lead counsel for the plaintiffs, is out of the office today attending to a family health issue; his mother is undergoing surgery. Notwithstanding the Court's offer to extend the time to submit the *joint* discovery letter to the Court (as necessary), opposing counsel is insisting upon *unilaterally* submitting its *own* letter, apparently for the purpose of objecting to providing any disclosure at all, ostensibly in violation of the Court's directive.

To the extent that the Court is inclined to consider opposing counsel's unilateral letter, we respectfully request that the Court defer consideration thereof until we have been afforded the opportunity to respond to it, which, we expect, will be Wednesday.

Thank you for your consideration.

Respectfully submitted,



Lauren A. Rudick (LR 4186)

LAR: me

c: Samuel Dolinger, Esq.
Joseph Bondy, Esq.
David Holland, Esq.