

The Law Offices of
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November 27, 2017

BY ECF FILING: 212 805-7942
The Hon. Alvin K. Hellerstein
US District Court Judge
500 Pearl Street
New York, New York 10007

Re: *Washington v. Session - 17-cv-05625 (AKH)*
Request For Additional Extension Of Time To Interpose Opposition To Government's
Pre-Answer Motion to Dismiss

Dear Judge Hellerstein:

On behalf of Plaintiffs, and with the consent of the Government, I am writing to you respectfully requesting an additional extension of the dates for interposing opposition to and the Government's Reply in furtherance of the Pre-Answer Motion to dismiss.

The reasons for the extension are that Plaintiffs' Counsel have returned from the holiday weekend and continue to edit down the opposition brief to which each of the *pro bono* law firms have contributed sections to address the eight points raised therein. As such, Plaintiffs' counsel are not able to adequately and succinctly address the issues raised by the dismissal motion by the end of today, November 27th, as presently scheduled.

As agreed to by AUSA Samuel Dollinger, Plaintiffs request that the deadline by which to interpose opposition to the Government's dismissal motion be extended to Friday, December 1, 2017, and the Government's deadline to submit a Reply extended to Friday, December 15, 2017. We will certainly afford Mr. Dollinger the same courtesy should he need additional time beyond that new date.

Such an extension ensures that all counsel are able to fully and adequately address the significant legal issues presented at this stage of the matter.

Please do not hesitate to contact me at the number below if there are any questions or concerns of the Court that I may address with regards to this request.

Sincerely,

David C. Holland
David C. Holland, Esq.

So ordered. 11/27/2017

Alvin K. Hellerstein

USDC SDNY
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