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June 25, 2019

BY ECF

Honorable P. Kevin Castel
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
New York, New York 10007-1312

Re: *Steck v. DiNapoli, et al.*, 19-cv-05015 (PKC)

Dear Judge Castel:

In accordance with Rule I.B. of Your Honor's Individual Practices, I write on behalf of defendants Thomas P. DiNapoli, H. Carl McCall, Scott Stringer and The State of New York¹ to request an extension of time to move or answer with respect to plaintiffs' complaint to and including July 25, 2019, and to postpone the Initial Pretrial Conference from August 2, 2019, to August 16, 2019, or a date thereafter that is convenient for the Court. The State's current deadline to respond to the complaint is June 26, 2019, the current deadline for DiNapoli and McCall to respond to the complaint is June 27, 2019, and the current deadline for Stringer to respond is June 28, 2019.

Defendants request an extension to move or answer with respect to the complaint to permit them sufficient time to investigate the facts of the case and to conduct research regarding the various grounds on which plaintiffs seek relief. In accordance with Rule I.B. of Your Honor's Individual Practices, the parties propose a date for the Initial Pretrial Conference that is 14 days after the original date for that conference, as set forth in Your Honor's May 31, 2019 Order.

No adjournment or extension of these dates was previously sought. I have spoken with

¹ Plaintiff has not yet served the remaining defendant, William C. Thompson, Jr., and thus his time to respond to the complaint has not yet begun to run.

*Time to respond adjourned to July 25.
Conference adjourned from August 2 to Sept. 3, 2019 at 12:00 p.m.
SO ORDERED
USDJ
6-25-19*

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Philip G. Steck, Esq., counsel for plaintiffs, regarding these proposed dates, and he has advised me that he consents to defendants' request to extend these dates.

I thank the Court for its attention to this matter.

Respectfully yours,

/s/ Mark E. Klein

Mark E. Klein
Assistant Attorney General

cc: Plaintiffs' counsel (by ECF)