AMERICAN CIVIL LIBERTIES

125 BROAD STREET, 18TH FL.

NEW YORK, NY 10004-2400

OFFICERS AND DIRECTORS

UNION FOUNDATION NATIONAL OFFICE

T/212.549.2500 WWW.ACLU.ORG

PRESIDENT

SUSAN N. HERMAN

ANTHONY D ROMERO

EXECUTIVE DIRECTOR



November 1, 2013

BY ECF

Honorable Pamela K. Chen United States District Judge United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re:

Raza et al. v. City of New York et al. Case No. 13-cv-03448-PKC-JMA

Dear Judge Chen:

On behalf of Plaintiffs, we write to respectfully request an enlargement of the page limit for Plaintiffs' Reply in Support of their Motion for Expedited Discovery. Plaintiffs seek permission to file a reply brief of no more than fifteen pages in length. Plaintiffs request this short enlargement in order to adequately respond to the arguments and assertions put forward in Defendants' twenty-four-page opposition brief (ECF No. 23) and the twentyfive-page Declaration of David Cohen (ECF No. 25) submitted by Defendants in support of their opposition brief.

We have consulted with counsel for the Defendants, who indicated that they object to Plaintiffs' request.

Ramzi Kassem Diala Shamas CLEAR project Main Street Legal Services, Inc. CUNY School of Law 2 Court Square Long Island City, NY 11101 Phone: (718) 340-4558 Fax: (718) 340-4478

ramzi.kassem@law.cuny.edu

Respectfully submitted,

Hina Shamsi Patrick Toomey Ashley Gorski

American Civil Liberties Union

Foundation

125 Broad Street, 18th Floor New York, NY 10004

Phone: (212) 549-2500

Fax: (212) 549-2654 hshamsi@aclu.org

Arthur N. Eisenberg
Mariko Hirose
New York Civil Liberties Union
Foundation
125 Broad Street, 19th Floor
New York, NY 10004
Phone: (212) 607-3300
Fax: (212) 607-3318
aeisenberg@nyclu.org

Counsel for Plaintiffs

Cc by ECF: Peter G. Farrell, Esq. Alexis L. Leist, Esq.

AMERICAN CIVIL LIBERTIES UNION FOUNDATION