



THE CITY OF NEW YORK  
LAW DEPARTMENT

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March 24, 2014

**BY ECF**

The Honorable Joan M. Azrack  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Raza et al. v. City of New York et al., 13 Civ. 3448 (PKC)(JMA)

Dear Judge Azrack:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and one of the attorneys assigned to the above-referenced matter. I write on behalf of both parties, as directed by the Court on March 19, 2014 (Docket Entry 43), to provide the Court with our joint proposed document production schedule.

The proposed document production schedule is as follows:

- Start date of April 21, 2014 for rolling productions
- End date of August 1, 2014 for all document discovery<sup>1</sup>

In addition, the due date for any additional document requests by Plaintiffs is April 4, 2014.<sup>2</sup>

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<sup>1</sup> The parties note that they are working towards trying to reach an agreement as to the custodians and search terms for electronically stored information "ESI" (emails, social media, etc.) and thus the amount of responsive ESI that will need to be reviewed is currently unknown. The parties will advise the Court in the event that ESI discovery warrants a different end date.

We thank the Court for your consideration herein.

Respectfully Submitted,

\_\_\_\_\_/s\_\_\_\_\_

Alexis L. Leist  
Assistant Corporation Counsel

cc by ECF: Plaintiffs' Counsel

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<sup>2</sup> Defendants do not waive their right to make additional document requests or interrogatories by April 4, 2014. Plaintiffs reserve their right to object to any such requests, including on the ground that they are untimely.