



**White Plains**  
81 Main Street, Suite 400  
White Plains, NY 10601  
914.607.7010 | P  
info@abramslaw.com | E

Long Island · Brooklyn · White Plains · Rochester · Albany · Manhattan

September 19, 2024

**VIA NYSCEF**

Hon. Maria S. Vazquez-Doles  
Orange County Supreme Court  
Orange County Government Center, Courtroom 5  
285 Main Street  
Goshen, NY 10924

Re: *Oral Clarke et al. v. Town of Newburgh et al.*, Index No. EF002460-2024

Dear Justice Vazquez-Doles:

We represent plaintiffs Oral Clarke, Romance Reed, Grace Perez, Peter Ramon, Ernest Tirado, and Dorothy Flournoy (collectively, the “plaintiffs”) in this matter. On August 26, the parties submitted a potential briefing schedule for summary judgment to the Court while requesting a November trial date. (Dkt. No. 39.) On August 29, 2024, the Court scheduled trial for November 1, 2024, but did not establish a briefing schedule for summary judgment. (Dkt. No. 41.) While no briefing schedule was formally entered, we together with defendants (the “parties”) respectfully request adjusting our proposed briefing schedule to accommodate several depositions that needed to be rescheduled. Specifically, the parties respectfully request the following briefing schedule:

- September 25, 2024 – deadline to file moving briefs;
- October 16, 2024 – deadline to file opposition briefs;
- October 23, 2024 – deadline to file reply briefs.

Separately, the parties respectfully request that the word limits be increased to 10,000 words for the moving and opposition briefs and 5,000 words for the reply briefs for summary judgment.

Respectfully yours,

Robert A. Spolzino

cc: All Counsel (via NYSCEF)