



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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December 29, 2020

**BY ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: George Greco, et. al. v. City of New York, et. al.,  
20-CV-9265 (LJL)

Your Honor:

I am the Assistant Corporation Counsel assigned to represent defendants City of New York and Dermot Shea in the above-referenced matter. I write to respectfully request that defendants be granted a 45-day enlargement of time, from January 5, 2021 until February 19, 2021, to answer or otherwise respond to the complaint. This application is made with the consent of plaintiff's attorney. This is defendants' first application for an extension of time to respond to the complaint. An initial conference in this matter is currently scheduled for January 14, 2021, and the parties intend to confer and file a proposed Case Management Plan and Scheduling Order by January 7, 2021, pursuant to Your Honor's Individual Rules of Practice.

Briefly, plaintiffs challenge N.Y. Penal Law § 400.00(3)(f) and Title 38, Section 5-03 of the Rules of the City of New York ("RCNY") pursuant to which the NYPD decides applications for concealed carry handgun licenses. It appears that the defendants were served with process on December 18, 2020. In accordance with this Office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need this additional time to investigate the allegations of the complaint. To that end, defendants are reviewing plaintiffs' claims and the records related to the individual plaintiff's application for a license. However, especially in light of the holidays, defendants require additional time to investigate and thoroughly respond to the complaint

Accordingly, defendants respectfully request an enlargement of time, until February 19, 2021, to answer or otherwise respond to the complaint.

I thank the Court for its consideration of this request.

Respectfully submitted,

/S  
Aimee K. Lulich  
Senior Counsel

**cc:** David Jensen, Esq. (By ECF)