



March 9, 2022

The Honorable Nicholas G. Garaufis
United States Courthouse
Room 1426 S
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Plaintiffs' Response to Defendants' Request for Pre-Motion Conference in
Roberts et al. v. Bassett et al., 22-cv-00710-NGG-RML**

Dear Judge Garaufis:

Pursuant to Rule V(A)(2)(a) of this Court's rules, Plaintiffs submit this letter in response to Defendants' Requests for a Pre-Motion Conference. *See* ECF Nos. 32, 33. Plaintiffs have addressed Defendants' arguments on standing in Plaintiffs' filings on their Motion for Preliminary Injunction currently pending before this Court, *see* ECF Nos. 19, 27. Plaintiffs write this letter solely to address Defendants' requests to extend the deadline for Defendants to answer the complaint until 45 days after the Court has ruled on forthcoming motions to dismiss.

Plaintiffs do not believe an extension is warranted. Plaintiffs do not anticipate extensive discovery and believe that any discovery can be conducted on an expedited basis. Plaintiffs' Complaint raises a single legal claim and alleges facts that can be ascertained by referencing government documents of which this Court can take judicial notice.

Plaintiffs have contacted Defendants to schedule a Rule 26(f) conference and propose such an expedited schedule for dispositive motions in this case. Because the case can—and should—

The Honorable Nicholas G. Garaufis
March 9, 2022
Page 2

proceed expeditiously to the merits, an extension for Defendants to answer the complaint is unwarranted.

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The Honorable Nicholas G. Garaufis
March 9, 2022
Page 3

AFFIRMATION OF SERVICE

I, Wencong Fa, declare under penalty of perjury that I caused the foregoing to be filed electronically through the CM/ECF system of the U.S. District Court for the Eastern District of New York, which will serve notice of said filing on all counsel of record.

Respectfully submitted this 9th day of March, 2022.

s/ Wencong Fa
WENCONG FA
Counsel for Plaintiffs
**Pro Hac Vice*