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August 21, 2025

Via ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Re: Cement Workers v. New York Presbyterian, 25-cv-06140-LAP
Unopposed Request for MTD Briefing Schedule*

Dear Judge Preska:

We represent Defendant The New York and Presbyterian Hospital (“NYP”) in the above-referenced action. We have conferred with Plaintiff, and with its consent, are writing to request that the Court enter the following agreed-upon briefing schedule for NYP’s anticipated motion to dismiss:

- NYP’s Opening Brief shall be due on October 6, 2025.
- Plaintiff’s Opposition shall be due on November 20, 2025.
- NYP’s Reply shall be due on December 22, 2025.

This schedule does not involve any extension of the initial motion date beyond the 60 days automatically set by Rule based on NYP’s waiver of service. (ECF 12). The Opposition and Reply Briefs would be set approximately 45 and 30 days later, respectively, to afford both parties the appropriate time to develop the arguments and present the issues concisely for this Court’s determination. There have been no prior requests for extensions, and this request will not affect any other scheduled deadlines.

The Clerk of the Court shall close dkt. no. 18.

Respectfully submitted,

/s David A. Munkittrick

SO ORDERED:

Date: August 22, 2025

Loretta A. Preska
Hon. Loretta A. Preska, U.S.D.J.