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November 11, 2022

Hon. Loretta A. Preska
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2200
New York, NY 10007

Re: *Baez et al. v. New York City Housing Authority (NYCHA)*, No. 13-cv-8916 (LAP)

Dear Judge Preska:

We are co-counsel for Plaintiffs in the above-referenced matter and jointly submit this letter with counsel for Defendant to request the reappointment of Stout Risius Ross, LLC as Independent Data Analyst ("IDA"); Microecologies, Inc. as Independent Mold Analyst ("IMA"), and Cesar de Castro as Ombudsperson (collectively, the "Independents"). By Order dated November 29, 2021, the Court invited the parties to file an application no later than November 30, 2022 concerning whether the appointments of the Independents should be extended. *See* ECF No. 379. Consistent with the Court's order, the parties jointly submit this letter motion respectfully moving the Court to enter an Order extending the appointments of the Independents through December 31, 2023 and including a provision that the parties may file any motions in support of the further reappointment of the Independents by November 30, 2023.

In support thereof, the parties state that the continued work of the Independents (along with the work of the Ombudsperson Call Center ("OCC")) is beneficial to NYCHA's ability to meet its obligations under the Revised Consent Decree so ordered by this Court. The parties would be pleased to provide the Court with additional information about the performance of the Independents and the OCC and the work they anticipate doing in the upcoming year should the Court deem such information useful. The Independents have agreed to submit their expected budgets to the Special Master at the beginning of the calendar year so that NYCHA may better allocate funds for their payment.

Wherefore, the parties respectfully request that the Court order the extension of the Independents' appointments through December 31, 2023 with an opportunity to move for their further reappointment by November 30, 2023.

Respectfully submitted,

/s/ David A. Picon

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SO ORDERED

LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

11/14/22

Counsel for Plaintiffs

Counsel for Defendant