



April 11, 2014

Honorable Edward R. Korman
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Abidor, et al. v. Napolitano, et al.* 1:10-CV-04059 (Korman, J.)
(Azrack, M.J.)

Dear Judge Korman:

AMERICAN CIVIL LIBERTIES
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Plaintiffs respectfully write to request that the Court extend the briefing deadline on the converted Rule 41(g) motion for return of property. Plaintiffs seek to extend the briefing deadline for both parties from Friday, April 18, 2014 until Monday, April 21, 2014, at 2:00 p.m. Plaintiffs request this short extension because they believe the extra days are necessary to provide adequate briefing on the issues currently pending before the Court. Defendants have consented to this request.

This is Plaintiffs' first request for an extension or adjournment of any kind in this action. Defendants previously requested: (1) an extension of time in which to serve and file a letter requesting a conference in connection with their motion to dismiss; and (2) an adjournment of oral argument on the present converted motion and an extension of the supplemental briefing deadline to seven days before the adjourned oral argument date. The Court granted both requests. Additionally, the Court previously adjourned oral argument from May 19, 2011 to June 24, 2011, due to various scheduling conflicts of the Court and counsel. No other requests for extension or adjournment have been filed in this proceeding.

Respectfully submitted,

/s/ Catherine Crump

Catherine Crump
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cc: Counsel of Record
(Via ECF)