



September 14, 2021

VIA ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *E.F. et al. v. The New York City Department of Education et al.*, Case No. 1:21-cv-00419-LDH-RML—Request to Record Hearings as a Reasonable Accommodation

Dear Judge DeArcy Hall:

Disability Rights Advocates writes as one of the counsel for Plaintiffs and the proposed class in this case to request the Court's permission to audio record future telephonic, video, or in-person meetings or hearings related to the case as a reasonable accommodation for one of our attorneys.

The recording of these meetings and/or hearings is an auxiliary aid that will help provide effective communication, allowing the attorney to comprehend complex legal matters and receive instructions so that they can zealously represent Plaintiffs and the proposed class in a manner that is consistent with the applicable rules of professional conduct. DRA provides such auxiliary aids as an accommodation as part of its compliance with the Americans with Disabilities Act.

The audio recordings are for the personal use of the DRA attorney requiring an accommodation and will not be distributed outside DRA unless legally mandated. The audio recordings are deemed confidential and will not be used by DRA for any purpose other than as a note taking auxiliary aid. Audio recordings will be maintained with the same security and privacy as other DRA case-related documents. Recordings will be destroyed in compliance with DRA's standard record keeping practice.

Feel free to contact us with any questions, and thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart Seaborn", is written over a horizontal line.

Stuart Seaborn*
DISABILITY RIGHTS ADVOCATES

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*Admitted *pro hac vice*