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April 18, 2024


**Via ECF**

Hon. Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York

The parties are directed to provide the Court with a status letter proposing a briefing schedule for any fees motion by August 15, 2024. The Clerk of Court is hereby directed to close Dkt. No. 262.

DATE: April 19, 2024

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

Re: *Reynolds v. Giuliani*, 98 Civ. 8877 (LJL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, attorney for the City Defendants in the above-referenced matter.

I write jointly on behalf of all the parties to advise the Court that the parties have reached a settlement agreement on a corrective action plan (the "CAP"), a copy of which is annexed hereto, to resolve Plaintiffs' motion for civil contempt (the "Motion"). The parties, therefore, respectfully request that the Court endorse the attached CAP to resolve the Motion.

The parties also respectfully submit that, with the exception of Plaintiffs' claims for costs, expenses, and attorneys' fees, the attached CAP fully resolves the Motion, without the need for the Court to make a determination or finding regarding the Motion. Separately, and without Defendants' conceding that Plaintiffs are, in fact, entitled to attorneys' fees, costs, or expenses for the Motion, the parties will endeavor to resolve Plaintiffs' fees claim on their own. To that end, Plaintiffs have agreed to provide Defendants with Plaintiffs' attorney billing records and a settlement demand for fees within 30 days. Given the time involved for Defendants to obtain settlement authority, the parties respectfully propose that, in the event that they are unable to resolve Plaintiffs' claims for fees, they provide the Court with a status letter with a proposed briefing schedule for any fees motion by August 15, 2024.

The parties thank the Court for its consideration of the within matters.

Respectfully submitted,

/s/

Philip S. Frank  
Assistant Corporation Counsel

cc: All counsel of record (via ECF)