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March 6, 2026

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BY ECF

Hon. Jeanette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***L.S.M. v. Genalo, et al., No. 26-cv-00942 (JAV)***

Dear Judge Vargas:

This firm and Brooklyn Defender Services represent the Petitioner in the above-referenced habeas corpus matter. On February 6, 2026, the Court issued an order granting the petition and directing that any application for fees under the Equal Access to Justice Act ("EAJA") be filed by March 9, 2026. (ECF No. 10).

I have conferred with Assistant United States Attorney Brandon Waterman, who represents the Respondents in this action. The parties jointly request that the Court enter judgment in the case and grant an extension of the deadline for submission and response to the fee application. After the judgment becomes final for purposes of the EAJA, if the parties have not been able to reach a resolution on the fee issue, counsel for the Petitioner will promptly file a fee application. *See Melkonyan v. Sullivan*, 501 U.S. 89, 96 (1991) ("Accordingly, we hold that a 'final judgment' for purposes of 28 U.S.C. § 2412(d)(1)(B) means a judgment rendered by a court that terminates the civil action for which EAJA fees may be received. The 30-day EAJA clock begins to run after the time to appeal that 'final judgment' has expired."). No prior requests for extensions have been made.

Respectfully submitted,

/s/ William E. Craco
William E. Craco