U.S. Department of Justice

United States Attorney
Eastern District of New York

271-A Cadman Plaza East
Brooklyn, New York 11201

April 10, 2026

By ECF

Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Martinez de la Cruz v. Russo et al.,* Civil Action No. 26-629 (HG)

Dear Judge Gonzalez:

This Office represents Respondents in this action. Respondents, with the consent of Petitioner, respectfully request that the Court give the parties until April 17, 2026 to submit a stipulation of settlement of this action.

By letter to the Court dated April 8, 2026 (Dkt. 18), the parties stated that they were nearing agreement on the terms of a stipulated dismissal, and intended to submit a stipulation of settlement to Your Honor by today, April 10. Since the filing of that letter, Petitioner has proposed additional terms for a settlement. The parties therefore request additional time to reach a settlement and submit a stipulation of settlement to Your Honor.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

JOSEPH NOCELLA
United States Attorney
Attorney for Respondents

By: /s/ Elliot M. Schachner
Elliot M. Schachner
Assistant U.S. Attorney
(718) 254-6053

cc: Counsel of Record (by ECF)