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SENT ELECTRONICALLY VIA CM/ECF

Hon. Judge Glenn T. Suddaby
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, NY 13261-7367

Re: Antonyuk, et al. v. Hochul, et al.
Federal Civil Action No. 1:22-cv-00986 (GTS/CFH)

Dear Judge Suddaby:

On behalf of the City of Syracuse and Chief of Police Joseph Cecile—a defendant in the above-referenced action (“Action”)—I apologize for the lack of appearance by this office at this morning’s oral argument before Your Honor, as well as a lack of a timely response to Plaintiff’s motion for a temporary restraining order (*see* Dkt. No. 8).

Due to numerous COVID-19 related illnesses in the Office of the Corporation Counsel, including the Corporation Counsel herself, neither the summons and complaint initiating this Action nor the motion for a temporary restraining order (“Motion”) (*see* Dkt. No. 6) were brought to my attention until sometime well after oral argument had commenced this morning. Moreover, the email address utilized by Plaintiffs (law@syrgov.net) is a general information email account that is only checked sporadically and informs all senders that “[t]he City does not accept service of papers, process, or any legal communications to this email address.”

That being said, in the brief time that I have had to quickly review the Motion by Plaintiffs’ counsel, as well as the oppositions by the Office of the Attorney General (*see* Dkt. No. 18) and counsel for Sheriff Don Hilton and District Attorney Gregory Oakes, we join our co-defendants in their resolute position that Plaintiffs’ articulated grounds for an emergency temporary restraining order are without merit.

Thank you for your consideration.

Respectfully submitted,
/s/Todd M. Long
Todd M. Long, Esq.
Senior Assistant Corporation Counsel

CC: All counsel of record electronically via CM/ECF