



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

September 16, 2025

BY ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *State of New York et al. v. U.S. Department of Education et al.*,
No. 25 Civ. 2990 (ER)

Dear Judge Ramos:

This Office represents defendants in the above-referenced matter. We write respectfully to request a one-week extension of time, from September 17, 2025, to September 24, 2025, to respond to the Complaint. The reason for this request is that the parties are currently engaging in discussions regarding possible resolution of the lawsuit without the need for further court intervention.

This is the Government's fifth request for an extension of time regarding its response to the Complaint. The Court granted the Government's previous requests for extensions. Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Dana Walsh Kumar
CHARLES S. JACOB
DANA WALSH KUMAR
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2725 / 2741
dana.walsh.kumar@usdoj.gov
charles.jacob@usdoj.gov

cc: *Plaintiffs' counsel* (by ECF)