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(not for service)

April 12, 2019

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Re: *Christa McAuliffe Intermediate School PTO, Inc. v. Bill de Blasio*,
18cv11657 (ER)(OTW)

Dear Judge Ramos:

I write in response to the March 29, 2019 letter of the NAACP Legal Defense & Education Fund, Inc. ("LDEF") written on behalf of the Proposed Defendant-Intervenors: Teens Take Charge; Desis Rising Up & Moving ("DRUM"); Hispanic Federation; Elizabeth Pierret on behalf of her minor child O.R.; Odunlami Showa, on behalf of his minor child A.S.; Rosa Velasquez, on behalf of her minor child C. M.; Tiffany Bond, on behalf of her minor child K.B.; and Lauren Mahoney, on behalf of her minor children N.D.F. and N.E.F. Defendants note that some of the Proposed Defendant-Intervenors do not have standing.

As a general matter, Defendants welcome the involvement of the Proposed Defendant-Intervenors due to the expertise of their counsel and because the testimony of some of the Proposed Defendant-Intervenors may be relevant and offer a helpful perspective. While the benefit of the Proposed Defendant-Intervenors' counsel could also be provided to the Court as amicus and the Defendants could work with the Proposed Defendant-Intervenors in presenting evidence to the Court, Defendants do not oppose the Proposed Defendant-Intervenors' motion to intervene, provided that their intervention does not delay the resolution or materially change the scope or course of the litigation.

Specifically, Defendants are not opposed to the proposed intervention provided that Proposed Defendant-Intervenors do not: (i) materially expand discovery; (ii) join new parties; (iii) move for judgment on the pleadings; (iv) bring a cross-claim against Defendants; or (v) seek relief other than dismissal of the action. If the Proposed Defendant-Intervenors were to pursue claims that are collateral to the issues currently before the Court, the result would be protracted

litigation and the possible intervention of additional parties. If the Proposed Defendant-Intervenors can provide assurances that the litigation will not be so diverted, Defendants do not oppose their motion to intervene.

Respectfully,

A handwritten signature in black ink, appearing to read "Thomas B. Roberts". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Thomas B. Roberts

Assistant Corporation Counsel