



Kenneth W. Jenkins  
County Executive

Office of the County Attorney

John M. Nonna  
County Attorney

September 2, 2026

**VIA EMAIL**

Hon. Walter Rivera  
Justice of the Supreme Court  
Supreme Court of the State of New York,  
County of Westchester  
111 Dr. Martin Luther King Blvd.  
White Plains, NY 10601

**Re: Letter Request to So-Order Proposed Motion Schedule,**  
*Umemoto v Westchester County*, Index No. 65935/2026 (Sup Ct, Westchester County)

Your Honor:

At the conference held in the above-referenced matter on Wednesday, August 19, 2026, the Court granted Defendants until Friday, November 20, 2026, to move to dismiss, and granted Plaintiffs thirty days to reply.

Defendants anticipate moving well before the last possible motion date. With an aim toward having the briefing proceed orderly, Defendants—with Plaintiffs' input and consent—hereby request that the Court so-order the following motion schedule:

- Motion Date: Friday, September 11, 2026
- Opposition Date: Tuesday, October 26, 2026
- Reply Date: Thursday, November 25, 2026
- Return Date: Wednesday, December 2, 2026

For clarity, Defendants note that this schedule—if so ordered—would simply be the noticed schedule; each party would still have the right to seek adjournments as necessary and in accordance with the applicable rules.

Very truly yours,

**JOHN M. NONNA**  
Westchester County Attorney  
*Counsel for Defendants*

A blue ink signature of Sean T. Carey, consisting of a stylized 'S' and 'C' followed by a horizontal line.

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CC: All Counsel (*via NYSCEF*)