U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

September 16, 2026

BY ECF
The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Sheresky v. United States*, No. 25 Civ. 8935 (PGG)

Dear Judge Gardephe:

On behalf of defendants, I respectfully request that the Court permit defendants to file the administrative record in this matter with the Court Clerk on a thumb drive or other electronic media, rather than on PACER. The reason for this alternative filing method is that the administrative record is voluminous (approximately 1100 pages) and consists of approximately 145 MB of PDF files. Because the Court's PACER system limits filings to 15MB, *see Electronic Case Filing Rules* at 4 (Feb. 2, 2026),[1] filing the complete record on PACER would require breaking the record into an unwieldly ten subparts and filing them separately.

In addition to filing the complete administrative record on a thumb drive or other electronic media, defendants would (i) file notice of the administrative record, the certification of the administrative record, and an index on PACER, and (ii) make the complete administrative record available to Chambers and to Plaintiffs via a secure file transfer website or other electronic means.

We thank the Court for its consideration of this request. Plaintiffs consent to this request.

Respectfully submitted,

JAMES M. MCDONALD
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cc (by ECF): Counsel for Plaintiffs

[1] *Available at https://www.nysd.uscourts.gov/sites/default/files/pdf/ecf_rules/ECF%20Rules%20February%202%202026%20FINAL%20v2.pdf*