

**TODD C. BANK, ATTORNEY AT LAW, P.C.**

**119-40 Union Turnpike  
Fourth Floor  
Kew Gardens, New York 11415  
(718) 520-7125**

**www.toddbanklaw.com**

**tbank@toddbanklaw.com**

June 19, 2025

United States District Court  
Southern District of New York  
Attn.: Judge Colleen McMahon

**Re: Todd C. Bank v. NFL Properties LLC  
Case 1:25-cv-03981-CM**

Dear Judge McMahon:

I, the plaintiff in the above-referenced matter, respectfully request permission to submit, in opposition to Defendant's dismissal motion (Docs. 16, 17), a memorandum of law, which is due on June 24, of up to 40 pages. Defendant has stated that it does not consent to this request.

I have followed the Court's advice to "save pages by not including citations to unofficial reporters" and "by not telling the Court the obvious . . . ." However, I will still be unable to adequately present my arguments without a page enlargement given the decades of pertinent case law and the primary and subsidiary issues that must be addressed.

I am fully confident that adequate briefing on my part would make it clear that it is Defendant, not I, that has made frivolous arguments with respect to both the question of whether I have standing and the question of whether, if I have standing, I am entitled to prevail on the merits. Likewise, I believe that the Court would agree with me that the tone of Defendant's brief, *i.e.*, of arrogance and irritation over having to waste its time on this case, is merely a facade to try to distract the Court from the fact that Defendant's motion is entirely without merit.

I have standing, and I am right on the merits; please let me (adequately) show the Court why.

Sincerely,

***s/ Todd C. Bank***

Todd C. Bank