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June 2, 2006



TIME A.M.

VIA ELECTRONIC FILING

Magistrate Judge Joan M. Azrack United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Yanouskiy, as Administrator for Stanitskyy v. Eldorado Logistics, et. Al.

Docket No.: 05-CV-2202 (SJ) (JMA)

Dear Judge Azrack

This firm represents the plaintiff in the above wrongful death action. Kindly accept this as a status report and request to "so order" the briefing date set forth below. Defendants previously filed this motion to dismiss this case based on lack of personal jurisdiction, and other grounds. The court permitted plaintiff discovery limited to the jurisdictional issues. Defendant ultimately provided the responses to plaintiff's interrogatories on May 5, 2006, at which time the briefing schedule was adjusted to reflect that production.

Accordingly, your Honor set down June 5, 2006 as the due date for plaintiff's opposition papers and defendant's reply papers were due June 19, 2006.

Unfortunately, my trial schedule has been such recently that I have not yet been able to finalize our response.

Thus, as per instructions from your chambers and consent of defendant's counsel it is respectfully requested that the briefing schedule for defendants' motion to dismiss for lack of jurisdiction, improper venue and forum non coveniens, be extended as follows:

- Plaintiff's opposition papers served by June 26, 2006;
- Defendant's reply papers served by July 10, 2006.

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Accordingly, it is respectfully requested that the Court grant this extension.

Thank you for your consideration of this matter. If you have any questions, please contact me at your convenience.

Verv truly yours.

ANDREW'H. PILLERSDORF (2852)

AHP/mcv

cc: David Abrams, Esq.
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File No.: 810-3012

s/JMA

6/5/06