

# BONNER KIERNAN

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October 25, 2010

Via Fax Only (973-645-4549)

Hon. Joseph Dickson, U.S.M.J.  
United States District Court  
District of New Jersey  
1 Federal Square  
Newark, NJ 07101

Re: *Deborah Fellner, Individually and on Behalf of Those Similarly Situated v. Tri-Union Seafoods, L.L.C., d/b/a Chicken of the Sea*  
Civil Action No. **06-CV-688 (DMC)**  
BKT&C File No. 0558.0049

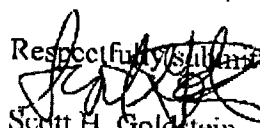
Dear Judge Dickson:

We represent defendant Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea in the above-captioned matter.

Pursuant to this Court's scheduling Order from the last conference, the parties agreed to meet and confer regarding our disputes over the scope of discovery. We conducted that meeting today and made significant progress. However, we still have some issues that we need to discuss with our respective clients regarding the extent to which we can agree to limit the written discovery.

Once we have reached an agreement as to most issues, there will still be a few issues remaining that will be the subject of the position paper as discussed in the Order. Accordingly, given the fact that we need additional time to finalize our agreement on the scope of discovery and that the conference has been adjourned until November 12, 2010, we respectfully request a one (1) week extension of time for both parties to submit their respective position papers regarding the scope of discovery to the Court.

Respectfully submitted,

  
Scott H. Goldstein  
SG-8333

cc: Thomas Paciorkowski, Esq. (via Fax and e-mail)

**SO ORDERED**

s/ Joseph A. Dickson  
**Joseph A. Dickson, U.S.M.J.**

Date: 10/26/10