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December 13, 2010

Via Facsimile Only at (973-645-4549)

Hon. Joseph Dickson, U.S.M.J.
United States District Court
U.S. P.O. & Courthouse Building
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)
RE: Adjournment of September 9, 2010 Case Management Conference

Dear Judge Dickson:

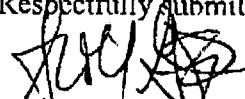
We represent Tri- Union Seafoods, L.L.C. ("Tri-Union") in the above captioned matter.

As Your Honor is aware, defendant's motion for a protective order is due today. However, we are still in the process of compiling information about the extent of Tri-Union's documentation. We expect that we will have this information by tomorrow or Wednesday. Accordingly we request a two-day extension of time to file the motion for a protective Order. Plaintiff has consented to this request.

In addition, plaintiff's opposition papers are currently scheduled to be due on January 3, 2011. Counsel requests an extension of time until January 10, 2011 to file such reply papers. Defendant consents to this request.

Accordingly, we respectfully request that the Court grant Defendant a two day extension of time to file its motion seeking a Protective Order until December 15, 2010. We further request that plaintiff's time to file opposition be extended by one week until January 10, 2011 and that Defendant's time to reply be also commensurately extended by one week from January 17, 2011 to January 24, 2011.

Respectfully submitted,


Scott H. Goldstein (SG-8333)

cc: Thomas Paciorkowski, Esq.

SO ORDERED

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

Date: 12/14/10