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November 8, 2012

(via ecf)

Honorable Joseph Dickson, U.S.M.J.
United States District Court
U.S. P.O. & Courthouse Building
Federal Square
Newark, New Jersey 07101

Re: *Deborah Fellner v. Tri-Union Seafoods, L.L.C., d/b/a Chicken of the Sea*
Civil Action No. 06-CV-688 (DMC)

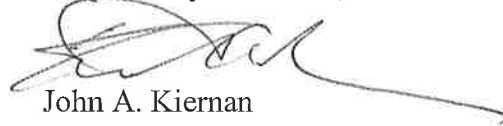
Dear Judge Dickson:

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

On October 18, 2012 Tri-Union submitted by letter, at your request, a Motion for Protective Order for your consideration concerning whether and to what extent documents that a co-defendant of Tri-Union produced during the Proposition 65 litigation, under the terms of a Stipulated Protective Order in that case, are subject to production and/or retain the confidentiality afforded by that Protective Order in this case.

Today, your law clerk contacted our office and asked that a Proposed Order be submitted as the Court had received no Opposition submission from the Plaintiff. Accordingly, Tri-Union encloses herein its Proposed Order.

Respectfully submitted,



John A. Kiernan
Kenneth A. Schoen

cc: Thomas Paciorkowski, Esq. (via ecf)
Stephen Grygiel, Esq. (via ecf)