

# KEEFE BARTELS

TRIAL ATTORNEYS

November 16, 2012

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**VIA ECF**

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

**John E. Keefe, Jr.<sup>1,3</sup>**  
**Patrick J. Bartels<sup>4</sup>**  
**Stephen G. Grygiel<sup>7</sup>**

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

Dear Judge Dickson:

We represent the Plaintiff in this case.


This letter follows up on Mr. Paciorkowski's November 13, 2012 letter to Your Honor, and Mr. Kiernan's November 14, 2012 response.

I spoke this afternoon with Defense counsel. Plaintiff's counsel believe a brief telephone conference with the Court is necessary to address the discovery issues about which we spoke with Your Honor on October 11, 2012 and that resulted in counsels' two letters of this week. Defense counsel disagrees.

We would be pleased to speak with the Court at the Court's earliest convenience.

Thank you.

Respectfully,

  
 Stephen G. Grygiel  
 For the firm

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