

**U.S. Department of Justice**

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SLR:SJK  
2005V00371

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June 28, 2006

FILED ELECTRONICALLY

Honorable Roanne L. Mann  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Kamburowski v. Kidd,  
No. CV-05-0953 (CBA) (RLM)

Dear Judge Mann:

Defendants in the above-referenced matter respectfully request an extension of time of sixty days, to September 29, 2006, to complete fact discovery. An extension is necessary because of difficulties in contacting witnesses and scheduling them for depositions. For instance, the undersigned has not been able to reach one fact witness who has retired since the underlying events in this matter. Another fact witness will be on a temporary duty assignment in Connecticut for most of July, and another fact witness has been permanently reassigned to Miami, Florida. Further, the undersigned will be on annual leave for first week in July. Currently, the fact discovery deadline is July 24, 2006. This is Defendants' second request for an extension in this case. The Court granted Defendants' first request, for an extension to respond to the complaint, on April 18, 2005, and counsel for Plaintiffs have consented to this request.

Respectfully submitted,

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