

Law Offices of  
**Gary Newlin Rawlins**  
310 Livingston Street  
Brooklyn, New York 11217

...  
Telephone: (718) 855 3005

June 7, 2005

The Honorable Robert P. Patterson, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: Davis v. Kirkpatrick & Lockhart LLP  
04-CV- 9195 (RPP)**

Dear Judge Patterson:

I am a co-counsel for Plaintiff in the above-referenced claim of employment discrimination on the basis of race. I write to respectfully request that the Court grant Plaintiff a sixty day enlargement of time to and including August 20, 2005 to complete his discovery of this case, for the below stated reasons. The present discovery deadline is June 20, 2005.

The undersigned co-counsel was retained by Plaintiff on April 6, 2005, and after a review of the case, I noted that Plaintiff's Complaint needed to be better pleaded. The defendant refused to consent to the amendment, thus Plaintiff was compelled to file a motion to amend his pleadings. That motion is still pending before Your Honor. Further, a review of the entire Plaintiff's case, revealed that Plaintiff will need to depose at least seven (7) employees of the defendant company to be ready for the trial of this case. Those depositions are still being arranged as the needs of all the parties is a factor to consider in setting the dates for said deposition.

I have conferred with the defense counsel and they have no objection to this request. No previous request to extent the discovery deadline in this case has been made. Accordingly, Plaintiff humbly request that the discovery deadline be extended to and including August 20, 2005.

I thank Your Honor for considering this request.

Respectfully Submitted  
GARY N. RAWLINS ESQ.

By            /s/  
Chidi Eze, Esq. (CE-4333)  
310 Livingston Street  
Brooklyn, NY 11217

cc: Justin Y.K. Chu  
Pollack & Kaminsky  
114 West 47<sup>th</sup> Street  
New York, NY 10036