

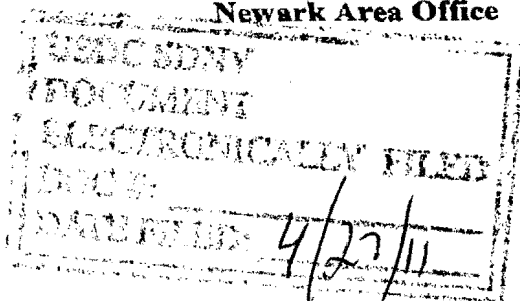
Equal Employment Opportunity Commission v. Kelley Drye & Warren, LLP

Doc. 46



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

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April 22, 2011

**By fax and by overnight mail**

APR 22 2011

Hon. Michael H. Dolinger, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007-1312

Re: Equal Employment Opportunity Commission v. Kelley Drye & Warren LLP, 10-CV-0655  
(LTS) (MHD)

Dear Magistrate Judge Dolinger:

At the end of the April 13, 2011 conference before Your Honor concerning discovery issues raised by Plaintiff EEOC, Defendant raised an issue that had not been the subject of a pre-motion letter, its request for time logs and records Mr. D'Ablemont kept regarding his work for his clients Cox Reps, TeleRep and HRP for a ten-year period. Your Honor stated that EEOC should respond to this request by April 27, 2011. EEOC does not possess these documents; and Mr. D'Ablemont has stated that given the very lengthy time frame of this request, ten years, he will need an additional week to be able to gather and review these documents. Therefore, if Your Honor approves, by May 5, 2011 either EEOC will produce the documents to Defendant; or alternatively (as Your Honor allowed in response to my inquiry at the April 13, 2011 proceeding), Mr. D'Ablemont will move to quash by that date. Defendant has consented to this one-week extension.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

*Jeffrey Burstein*  
Jeffrey Burstein

cc: Bettina B. Plevan, Esq. (by e-mail)  
Joseph C. O'Keefe, Esq. (by e-mail)

ENDORSED  
ORDER  
Application granted  
MC/USM  
4/24/11