

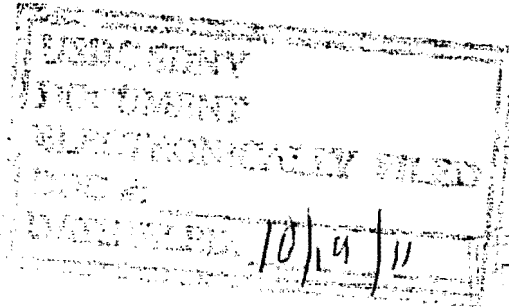


U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Newark Area Office

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

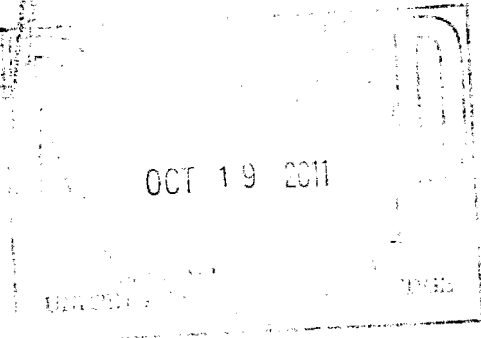
Doc. 94

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October 19, 2011



By Fax and by Mail

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 Judge Dolinger:

Please accept this letter as a joint request of both parties for a two-month extension for completion of fact discovery. Presently, pursuant to a ruling by the Court at a June 7, 2011 hearing, fact discovery is scheduled to end on November 30, 2011. While the parties have been diligently proceeding with discovery, including depositions, problems have arisen in scheduling depositions for most of the high-level Kelley Drye partners EEOC has notified Defendant it intends to depose due to limitations on such partners' availability for such depositions. Additional problems in proceeding with such depositions have occurred due to scheduling conflicts of Defendant's counsel resulting from other litigation. For these reasons, the parties respectfully request a two-month extension of fact discovery, making January 31, 2012 the termination date for fact discovery. This extension may also necessitate revision of the current schedule for expert discovery, presently set to be completed by January 21, 2012, per Your Honor's ruling at a July 15, 2011 proceeding. However, counsel for the parties are still discussing this issue, and will present the Court with a written proposal for revised deadlines for expert discovery, as well as for dispositive motions, no later than Tuesday October 25, 2011.

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

ENDORSED ORDER

At the parties' request, the deadline to complete fact discovery is extended to January 31, 2012.

MJ/USANT  
10/19/11

Respectfully submitted,

s/ Bettina Plevan *JP*  
Bettina Plevan, Esq.  
Attorney for Defendant  
Kelley Drye & Warren LLP

*Jeffrey Burstein*  
\_\_\_\_\_  
Jeffrey Burstein  
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FAX Cover Sheet

Date: October 19, 2011

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Re: EEOC v. Kelley Drye & Warren, LLP.  
10 Civ. 655 (LTS) (MHD)

*Endorsed order: "At the parties' request, the deadline to complete fact discovery is extended to January 31, 2012."*

From: Magistrate Judge Michael H. Dolinger  
United States District Court  
Southern District of New York  
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This document contains 2 pages, including this cover sheet.