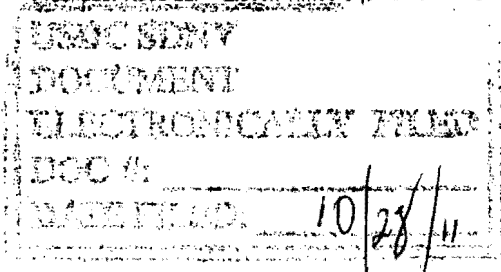


Proskauer >>

Proskauer Rose LLP - Eleven Times Square - New York, NY 10036-8299



October 27, 2011

By Fax and Mail

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Chief Magistrate Judge Michael H. Dolinger
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: EEOC v. Kelley Drye & Warren LLP
Case No. 10CV 655 (MHD)

Dear Judge Dolinger:

On October 19, 2011, Your Honor granted the parties joint request' for a two month extension of fact discovery. In the parties' joint request we stated that we would provide a proposed schedule for the completion of expert discovery and dispositive motions. We have consulted with the EEOC and our proposed schedule follows:

- January 16, 2012:** Initial expert designation
- February 15, 2012:** Expert counter designation
- March 2, 2012:** Expert report from experts designated initially on January 16
- April 2, 2012:** Expert reports due for experts counter designated on February 15
- April 16, 2012:** Expert reports in reply to reports served on March 2 or April 2
- April 30, 2012:** Completion of expert depositions
- May 25, 2012:** Deadline for dispositive motion (this deadline would be moved to April 27 if no experts are designated)

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

Respectfully,

Bettina B. Plevan
Bettina B. Plevan

cc: Jeffrey Burstein, Esq.

ENDORSED ORDER
The proposed amendments to the current pretrial schedule are adopted.

M. J. Smith
10/27/11

0507/42495-001 current/25632914v1

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FAX Cover Sheet

Date: October 27, 2011

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

Endorsed order: "The proposed amendments to the current pretrial schedule are adopted."

From: Magistrate Judge Michael H. Dolinger
United States District Court
Southern District of New York
500 Pearl Street, Room 1670
New York, New York 10007-1312

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This document contains 2 pages, including this cover sheet.