

Schoolcraft v. The City Of New York et al

Doc. 49

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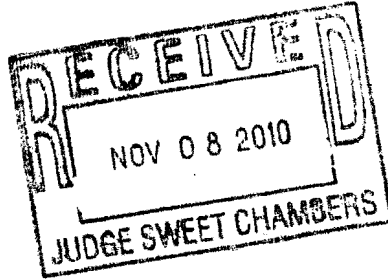
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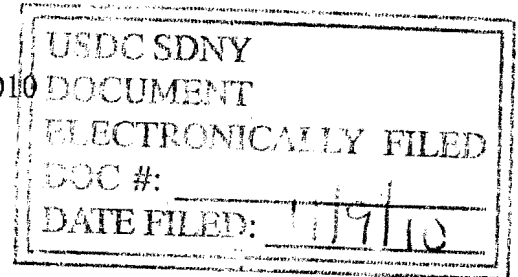
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November 8, 2010



BY FACSIMILE
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Honorable Robert W. Sweet
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Sweet
11/8/10

Re: **Schoolcraft v. City of New York, et al.**
10 CV 6005 (RWS)

Your Honor:

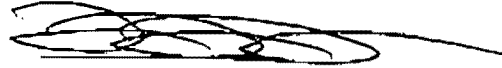
I represent the plaintiff in the above-referenced matter and write to Your Honor to respectfully request an extension of the deadline to respond to defendant, Jamaica Hospital's motion to dismiss, which is currently scheduled for November 19, 2010, until December 17, 2010. This is plaintiff's second request for an adjournment. Counsel for defendant, Gregory J. Radomisli, consents to this request.

Since the time of the first request on October 18, 2010, plaintiff's counsel has had to conduct several out of state depositions in the matter of Rodriguez, et al. v. It's Just Lunch International et al., 07 CV 9227, which is pending before the Honorable Sidney Stein. Additionally on November 19, 2010 plaintiff's counsel will be starting a wrongful death trial which will take several weeks to complete. As such, it will be extremely difficult to meet the current response deadline and thus has occasioned the instant request.

Based on the foregoing, plaintiff respectfully requests that Your Honor grant additional time to respond to defendant's motion to dismiss, and adopt the following briefing schedule:

Plaintiff's Opposition:	December 17, 2010
Defendant's Reply:	January 21, 2011
Oral Argument:	January 26, 2011

Very truly yours,

A handwritten signature in black ink, appearing to be "Jon L. Norinsberg", written over a horizontal line.

Jon L. Norinsberg

cc: Gregory J. Radomisli
(212) 949-7054