

# WUERSCH & GERING

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**Gregory F. Hauser | Partner**

E-mail Gregory.Hauser@wg-law.com

Direct 212-509-4717

April 14, 2023

**By ECF:**

Hon. Vernon S. Broderick  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Am. Lecithin Co. et al. v. Rebmann, 12-CV-929 (VSB)*

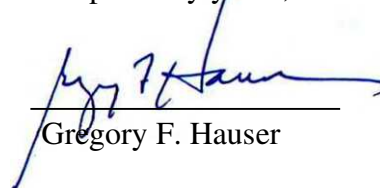
Your Honor:

This firm represents the Plaintiffs and the Third-Party Defendant in the above-referenced case. This letter is in regard to the Court's January 31, 2023 order that "[t]he deadline for the parties to produce documents shall be April 17, 2023" (Dkt. 317). The parties have met and conferred regarding their anticipated document productions and are in the process of completing thorough searches. Defendant's counsel joins me in respectfully requesting a two-week extension of the April 17 deadline to allow adequate time to complete production. We greatly appreciate the Court's consideration of our request.

Additionally, in connection with the Court's orders of March 22, 2023 and April 5, 2023 (Dkts. 322 & 324), the parties respectfully submit their proposed remote-deposition protocol as Exhibit A. The parties have met and conferred concerning the protocol and are in agreement regarding all provisions except for a portion of the second paragraph (concerning permissible data-privacy objections). The parties have set forth their respective positions on the disputed provision on pages two and three of the proposed protocol.

Thank you for your attention to this matter.

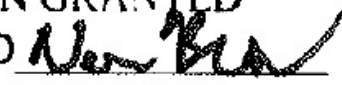
Respectfully yours,



Gregory F. Hauser

Cc: Joshua E. Abraham, Esq. (by ECF)

Wuersch & Gering LLP Firm 212-509-5050  
100 Wall Street, 10<sup>th</sup> Floor Web wg-law.com  
New York, NY 10005

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 04/17/2023

The parties shall produce the requested documents by May 1, 2023. I will issue a separate order addressing the proposed remote deposition protocol.