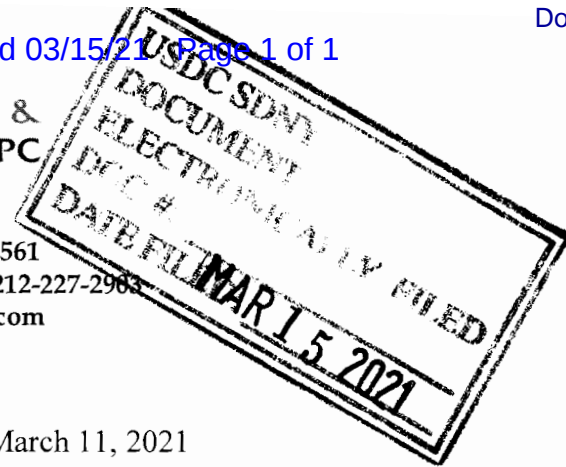




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March 11, 2021

VIA FACSIMILE (212) 805-6737 & ECF

Hon. George B. Daniels
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1310
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAR 15 2021

**Re: Ronald S. Herbst v. NYU Hospitals Center, both individually
and d/b/a Langone Medical Center and d/b/a NYU Hospital
For Joint Diseases and Nirmal C. Tejwani, M.D.
United States District Court, SDNY
File No. 15-CV-3518 (GBD)**

Dear Judge Daniels:

We are the attorneys for the defendants in this matter, NYU Hospitals Center and Dr. Nirmal Tejwani. We write in conjunction with the plaintiff's counsel to seek a two week adjournment of the deadline to file the Joint Pre Trial Order, which is currently due tomorrow, March 12th. This case is scheduled for a Pre-Trial Conference on April 1, 2021, with a trial date of June 21, 2021.

The parties have continued to work amicably in preparation for drafting a Joint Pre Trial Order; however, various additional medical records have been and are still being received and we would like the opportunity to incorporate some of that information into the proposed Pre Trial Order.

Accordingly, by this letter, the parties respectfully request that the time to submit the Joint Pre Trial Conference be extended to March 26, 2021. Counsel for the plaintiff (Steven T. Halperin, Esq.) has consented to this application.

Very truly yours,

Matthew L. Prisco

Matthew L. Prisco

cc: **VIA EMAIL & ECF**
Halperin & Halperin, P.C.
Attorneys for Plaintiff