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KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

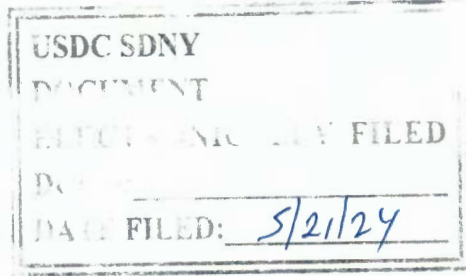
1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2540

DIRECT EMAIL jdabbs@kaplanhecker.com



May 20, 2024

BY CM/ECF

MEMO ENDORSED

The Honorable Louis L. Stanton
United States District Court for the Southern District of New York
500 Pearl Street, Room 2250
New York, NY 10007

Re: *United States ex rel. Foreman v. AECOM et al., No. 16-cv-1960 (LLS)*

Dear Judge Stanton:

We write on behalf of all parties to jointly request permission to schedule certain depositions in the above-captioned action after the fact deposition deadline. The current deadline for completion of fact depositions in this case is today, May 20, 2024. (See Revised Scheduling Order § 1(a)(i), ECF 168.) While the parties have worked diligently in an effort to complete fact depositions ahead of the deadline, the schedules of both counsel and witnesses did not permit the taking of all depositions prior to May 20.

Specifically, the parties request that they be able to hold the deposition of a witness testifying on behalf of Defendants, pursuant to Federal Rule of Civil Procedure 30(b)(6), on June 13, 2024. Pursuant to the Court's Order of April 18, 2024 (ECF 182), counsel for Defendants have also provided Relator's counsel with the availability of non-party Freddie Greer to be deposed after May 20, 2024. Further, the parties are continuing to discuss scheduling for a previously noticed deposition of non-party Jon Nagel. Finally, it is Relator's position that a single witness is not sufficient to adequately cover all topics in the Rule 30(b)(6) notice for all witnesses. While Defendants disagree, to the extent that one or more additional Rule 30(b)(6) depositions may need to be scheduled, the parties request permission to do so after June 13, 2024.

As a result, the parties respectfully request that they be permitted to hold the Rule 30(b)(6) deposition of Defendants on June 13, and, to the extent necessary, the above-noted depositions after May 20, 2024.

We appreciate the Court's attention to this matter.

Granted and so
Ordered.

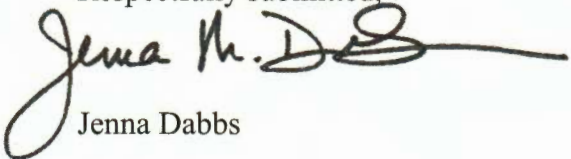
Louis L. Stanton

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KAPLAN HECKER & FINK LLP

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Respectfully submitted,



Jenna M. Dabbs

CC: All Counsel of Record (by ECF)