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July 15, 2021

**VIA ECF**

The Honorable Sarah L. Cave, U.S.M.J.  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Plaintiffs' request for leave to take the deposition of Deborah Bernick after the close of discovery (ECF No. 55) is GRANTED. Ms. Bernick's deposition shall take place by **August 11, 2021**.

The Clerk of Court is respectfully directed to close ECF No. 55.

SO ORDERED 7/16/2021

Re: WAOF 6.1-001  
*ORT America, Inc., et al v. U.S. ORT Operations, Inc., et al*  
Civil Action No. 1:20-cv-00790-ALC-SLC

  
SARAH L. CAVE  
United States Magistrate Judge

Dear Magistrate Judge Cave:

We represent Plaintiffs ORT America, Inc. and Women's American ORT Foundation. We write to request leave to take a further fact deposition after the close of discovery set by Your Honor's February 9, 2021 Discovery Scheduling Order. We have the consent of Defendants for this request.

The discovery close date set by Your Honor's Discovery Scheduling Order was April 15, 2021. On June 9, 2021, Defendants served a document titled Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A). In this document, Defendants amended their disclosures to list an additional individual, Deborah (Debbie) Bernick, that Defendants state may have discoverable information.

We have discussed this matter with counsel for Defendants and have requested to take the discovery deposition of Ms. Bernick. Counsel for Defendants has agreed, and stated that Ms. Bernick is available for a deposition on August 11, 2021.

Therefore, we request permission to take the deposition of Ms. Bernick after the close of discovery on August 11, 2021. We are not requesting the adjournment of any dates scheduled in this action.

Counsel for Defendants has reviewed this letter and joins in this request.