



Counseling and Advising Clients Exclusively on Laws of the Workplace

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July 27, 2012

VIA ECF

The Honorable Joseph F. Bianco
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Zarda v. Altitude Express, Inc., et al.
Case No.: CV-10-4334 (JFB)(ARL)

Your Honor:

We represent defendants in the above-referenced matter. We write in response to Plaintiff's July 20, 2012 letter regarding outstanding discovery.

Defendants do not object to Plaintiff's "request to make a motion" subject to the condition that the motion is ripe. Defendants' counsel is in the process of obtaining the materials and will provide them to Plaintiff as soon as reasonably practicable.

We remain available should you have any further questions regarding this matter.

Respectfully submitted,

ZABELL & ASSOCIATES, PC

A handwritten signature in black ink, appearing to be 'Saul D. Zabell', is written over the printed name. Below the signature, the initials 'SDZ/KB' are printed.

Saul D. Zabell
SDZ/KB

cc: Gregory Antollino, Esq. (via ECF)