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June 28, 2017

**By ECF**

Hon. Cathy L. Waldor  
Martin Luther King Building &  
U.S. Courthouse  
50 Walnut Street, Room 4040  
Newark, New Jersey 07101

**Re: Conforti v. St. Joseph's Healthcare Sys., Inc., No. 2:17-cv-00050-JLL-CLW (D.N.J.)**

Dear Judge Waldor:

We write on behalf of the Plaintiff Jionni Conforti in the matter *Conforti v. St. Joseph's Healthcare System, Inc., et al.*, No. 2:17-cv-00050-JLL-CLW (D.N.J.), to respectfully request that the Court extend the time for which the parties may serve written discovery requests pursuant to Federal Rules of Civil Procedure 33 and 34. Defendants have also asked us to request that the Court reschedule the status conference currently calendared for August 16, 2017 (Dkt. No. 17).

First, paragraph 3 of the Pretrial Scheduling Order entered on June 7, 2017 (Dkt. No. 15) requires the parties to serve interrogatories and requests for production of documents on or before June 30, 2017, a date the parties did not propose in the Joint Discovery Plan submitted to the Court on April 19, 2017 (Dkt. No. 13). We request that this date in Paragraph 3 of the Scheduling Order be extended to July 28, 2017. Defendants consent to this requested extension. Attached hereto for your consideration is a proposed order.

Second, Defendants have a scheduling conflict with the status conference currently calendared for August 16, 2017, and request, with Plaintiff's consent, that the status conference be rescheduled. All of the parties are available on August 8, 9, 10, 24, 29, 30, 31, or on another date convenient to the Court.

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Respectfully submitted,

*/s/ Christopher T. Cook*

Christopher T. Cook

Encl.

cc: Christopher M. Mayer, Esq. (counsel to Defendants) (via ECF)  
Thomas A. Doherty, Esq. (counsel to Defendants) (via ECF)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JIONNI CONFORTI,

*Plaintiff,*

v.

ST. JOSEPH'S HEALTHCARE SYSTEM,  
INC.; ST. JOSEPH'S HOSPITAL AND  
MEDICAL CENTER D/B/A ST. JOSEPH'S  
REGIONAL MEDICAL CENTER; and  
FATHER MARTIN D. ROONEY,

*Defendants.*

Civil Case No. 2:17-cv-00050-JLL-CLW

**[PROPOSED] ORDER AMENDING  
PRETRIAL SCHEDULING ORDER**

**THIS MATTER** having come before the Court for an extension of time by which the parties may serve interrogatories and requests for the production of documents, as currently set forth in Paragraph 3 of the Pretrial Scheduling Order entered on June 7, 2017 (Dkt. No. 15):

**IT IS on this day of \_\_\_\_\_,**

**ORDERED THAT** the parties must serve interrogatories and requests for the production of documents on or before July 28, 2017.

\_\_\_\_\_  
**CATHY L. WALDOR**  
**United States Magistrate Judge**