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July 27, 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 remove the requirement under the Pretrial Scheduling Order (Dkt. 15 ¶ 3), as amended by the Order Amending the Pretrial Scheduling Order (Dkt. 19), that the parties serve by July 28, 2017 written discovery requests pursuant to Federal Rules of Civil Procedure 33 and 34.

Based on the progress of discovery in this matter, the parties agree that setting a separate deadline for serving interrogatories and requests for the production of documents prior to the close of fact discovery is no longer necessary. The Federal Rules of Civil Procedure and the September 22, 2017 close of fact discovery would thus govern the parties' default deadlines to serve such written discovery. *See* Dkt. 15 ¶ 2. Defendants consent to this request. Attached hereto for your consideration is a proposed order.

The parties also agree in principle to a three-month extension of fact discovery for this action. While the parties have not yet conferred upon a complete set of proposed revised dates, the parties will be prepared to discuss the overall discovery schedule at the August 8, 2017 conference.

Respectfully submitted,

/s/ Christopher T. Cook

Christopher T. Cook

Encl.

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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 ON TIME TO
SERVE WRITTEN DISCOVERY
REQUESTS**

THIS MATTER having come before the Court regarding the time by which the parties may serve interrogatories and requests for the production of documents, as currently set forth in the Pretrial Scheduling Order, as amended by the Order Amending the Pretrial Scheduling Order (Dkt. 19):

IT IS on this day of _____,

ORDERED THAT the parties may serve interrogatories and requests for the production of documents commensurate with the close of fact discovery, provided that such service is consistent with the requirements set forth in the Federal Rules of Civil Procedure and Local Civil Rules.

CATHY L. WALDOR
United States Magistrate Judge