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March 12, 2019

**By ECF**

Hon. Cathy L. Waldor  
U.S. District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

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

Dear Judge Waldor:

Pursuant to Local Civil Rules 7.1 and 37.1(b)(3), counsel for Plaintiff Jionni Conforti ("Mr. Conforti") writes to respectfully request the Court's permission to file a reply brief in further support of Mr. Conforti's Motion to Quash and for a Protective Order filed February 15, 2019 [Dkt. 69], and in response to Defendants' opposition to such Motion filed March 4, 2019 [Dkt. 73]. The Court has scheduled this motion for oral argument on April 29, 2019. [Dkt. 72]. Mr. Conforti requests that he be granted leave to file a reply brief, of no longer than 10 pages, by no later than **March 19, 2019**.

Mr. Conforti wishes to file a reply: (1) to respond to Defendants' newly raised attempt to depose two to three additional medical providers beyond the original six individuals subject to the disputed subpoenas [*see* Dkt. 73 at 12 n.2]; and (2) to address a number of arguments in Defendants' opposition brief that Mr. Conforti believes require clarification. Given the highly sensitive nature of the issues at hand and their importance and complexity, Mr. Conforti believes that a reply brief would assist the Court and would provide him with an opportunity to address Defendants' arguments raised in their opposition.

Based on the above, Jionni Conforti, by and through his counsel, respectfully requests that the Court grant leave for him to file a reply brief in further support of his Motion to Quash and for a Protective Order filed February 15, 2019, by no later than March 19, 2019.

Respectfully submitted,

By: /s/ Jaclyn M. Palmerson  
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*Attorneys for Plaintiff Jionni Conforti*

IT IS SO ORDERED, this \_\_\_\_ day of March, 2019.

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Hon. Cathy L. Waldor