



May 13, 2019

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
Martin Luther King Jr. Federal
Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Jionni Conforti v. St. Joseph's Healthcare System, et al.
Civil Action No. 17-cv-0050-CCC-CLW

Thomas F. Doherty
Partner
T. 973.639.2078
F. 973.297.6612
TDoherty@mccarter.com

Dear Judge Waldor:

We represent defendants St. Joseph's Healthcare System and Father Martin Rooney in the above-referenced matter, which is scheduled for a telephonic conference and oral argument (on plaintiff's Motion to Quash Subpoenas and for a Protective Order, D.E. 69) before Your Honor this afternoon at 2:30 p.m.

McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
T. 973.622.4444
F. 973.624.7070
www.mccarter.com

With the consent of plaintiff's counsel, I am writing to respectfully request that the telephone conference/argument be rescheduled until Friday, May 17, 2019 (prior to 3:00 p.m.), assuming the Court is available that day. This request is made to enable the parties to continue discussions that began before Your Honor at the last conference on April 29th concerning a potential settlement of an aspect of plaintiff's claims and possible stipulations that might moot issues that are before the Court in the pending motion. The parties' discussions were delayed by a full week after the April 29th conference because it took until the afternoon of May 6th for plaintiff's counsel to secure Mr. Conforti's consent to defense counsel's sharing certain medical records/information with their clients and insurance carrier in furtherance of the settlement talks. In lieu of the telephone conference before Your Honor this afternoon, counsel for both sides intend to use that time to have a meet-and-confer about plaintiff's settlement demand and potential stipulation language.

We appreciate Your Honor's consideration of this rescheduling request on short notice.

Respectfully,

/s/ Thomas F. Doherty

Thomas F. Doherty

cc: Tom Barnes, Esq. (via email)
Omar Gonzalez-Pagan, Esq. (via email)

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