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January 31, 2020

**By ECF**

Hon. Cathy L. Waldor  
United States Magistrate Judge  
District of New Jersey  
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-CCC-CLW**

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-CCC-CLW, to respectfully request that the Court extend the expert discovery deadlines in this matter. On December 3, 2019, the Court entered a Text Order setting the following expert discovery deadlines: "Affirmative expert report-February 14, 2020; Responsive report-March 27, 2020; Rebuttal report-April 17, 2020; Expert end-May 15, 2020." Dkt. 114. Plaintiff requests these expert discovery deadlines be extended as follows: Plaintiff's affirmative expert disclosures and reports due on March 20, 2020; Defendants' responsive expert disclosures and reports due on May 1, 2020; Plaintiff's rebuttal expert reports due on May 22, 2020; and expert discovery to close by June 19, 2020.

Plaintiff has been working diligently to identify the necessary experts and prepare expert reports. However, given the time conflicts that some of the potential experts have based on current research and grant deadlines, Plaintiff requires an extension of the expert discovery deadlines to be able to accommodate its preferred experts. The purpose of this request is not to cause undue delay but to accommodate already-identified potential experts' pre-existing professional commitments.

Counsel for the parties have conferred, and Defendants' counsel state that they consent to the requested relief.

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Respectfully submitted,

/s/ Jaclyn M. Palmerson  
Jaclyn M. Palmerson

cc: Christopher M. Mayer, Esq. (counsel to Defendants)  
Thomas A. Doherty, Esq. (counsel to Defendants)  
Omar Gonzalez-Pagan, Esq. (counsel to Plaintiff)  
Tom Barnes, Esq. (counsel to Plaintiff)

**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-CCC-CLW

**[PROPOSED] ORDER ON EXPERT  
DISCOVERY DEADLINES**

**THIS MATTER** having come before the Court by way of Plaintiff's January 31, 2020 letter to extend the expert discovery deadlines set on December 3, 2019 (Dkt. 114),

**IT IS on this** \_\_\_\_ **day of** \_\_\_\_\_, 2020,

**ORDERED THAT** Plaintiff's affirmative expert disclosures and reports are due on March 20, 2020; Defendants' responsive expert disclosures and reports are due on May 1, 2020; Plaintiff's rebuttal expert reports are due on May 22, 2020; and expert discovery will close by June 19, 2020.

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