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February 14, 2020

By ECF

Hon. Cathy L. Waldor
United States Magistrate Judge
U.S. District Court for the 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 Plaintiff Jionni Conforti in the above-captioned action to respectfully request an extension of time for Plaintiff to file his opposition to Defendants' motion for reconsideration [Dkt. 119].

Plaintiff was served with an unredacted version of Defendants' motion papers on February 6, 2020. The motion was noticed for March 2, 2020; accordingly, pursuant to L.R. 7.1(d)(2), Plaintiff's current deadline to file his opposition papers is February 18, 2020. Plaintiff respectfully requests a 13-day extension of the deadline to file his opposition papers, to March 2, 2020. This accords with an adjournment of the noticed motion day from March 2, 2020 to March 16, 2020 (the next-available motion day).

This is Plaintiff's first request for an extension of time to submit his opposition papers in connection with this motion; thus, no previous extension has been obtained. Counsel for the parties have conferred, and Defendants' counsel state that they consent to the requested relief.

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)

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**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.

Case No. 2:17-cv-00050-CCC-CLW

[PROPOSED] ORDER

This matter having been brought before the Court by Jaclyn Palmerson, Esq. of Quinn Emanuel Urquhart & Sullivan LLP, attorneys for Plaintiff Jionni Conforti, on application for an order granting an extension of time for Plaintiff to file his opposition papers to Defendants' motion for reconsideration (Dkt. 119), and the Court having considered the moving papers, this matter being considered, and, for good cause shown,

IT IS on this ____ day of February 2020, hereby

ORDERED that Plaintiff's application for an extension of time for Plaintiff to file his opposition papers to Defendants' motion for reconsideration (Dkt. 119) is hereby **GRANTED**; and it is further

ORDERED that Plaintiff shall file his opposition papers to Defendants' motion for reconsideration (Dkt. 119) on or before March 2, 2020.

At Newark, New Jersey

The Honorable Cathy L. Waldor
United States Magistrate Judge