



WESTCHESTER  
MEDICAL CENTER

January 15, 2008

Jordy Rabinowitz  
Senior Associate General Counsel

**By Facsimile: 914-390-4179**

**MEMO ENDORSED**

Hon. Stephen C. Robinson  
United States District Court Judge  
United States District Court  
Southern District of New York  
300 Quarropas Street, Room 633  
White Plains, New York 10601

Re: Lafaro, et al. v. New York Cardiothoracic Group, PLLC., et al.  
07 Civ. 7984 (SCR)

Dear Judge Robinson:

I am counsel for defendants in the above matter. At a December 7, 2007, preliminary conference, the Court granted defendants' request to move for Judgment on the Pleadings, seeking dismissal of the complaint in its entirety. Defendants' motion is to be filed on January 25, 2008. As discussed at that conference, and as detailed in my November 30, 2007, letter to the Court, the motion will seek to dismiss the complaint based on (i) immunities under the State Action Doctrine; (ii) immunities under the Local Government Antitrust Act; and (iii) issues surrounding antitrust standing.

The purpose of this letter is to respectfully request an extension of the 25-page page limit for memorandum of law provided for by Your Honor's individual rules. The three defenses at issue on this motion are complex, and discussion of significant Supreme Court and Second Circuit precedent is required. *Defendants are asking that the page limit be extended to 40 pages.*

Please call me with any questions.

Respectfully submitted,

Jordy Rabinowitz (JR-6538)

cc: Leonard M. Rosenberg, Esq.  
Richard Menaker, Esq.

Page limit for defendant's  
motion to dismiss is  
extended to 40 pages

*Stephen C. Robinson*

SO ORDERED

1/16/08