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March 13, 2012

VIA FEDEX

Hon. George B. Daniels
United States Courthouse
500 Pearl St., Courtroom 11A
New York, NY 10007-1312

MAR 15 2013

SO ORDERED
The April 3, 2013 conference is
adjourned until May 23, 2013 at
9:30 a.m.
George B. Daniels

Re: *Schear et al. v. Food Scope America, Inc. d/b/a Megu Tribeca, Masahiro Origuchi, Koichi Yokoyama and Salvatore Picardi, Case No.: 12 CV 0594*

Dear Judge Daniels:

We represent Defendants Food Scope America, Inc. d/b/a Megu Tribeca, Masahiro Origuchi, Koichi Yokoyama and Salvatore Picardi in the above-referenced matter. Pursuant to Your Honor's Individual Practices, we write to request an extension of time to complete discovery from March 31, 2013 through and including May 15, 2013. Due to the number of Plaintiffs and Defendants, we have encountered a number of problems in scheduling depositions. We are also in the process of preparing a supplemental production of documents which Plaintiffs have requested be completed before they take Defendants' depositions.

The parties in their Rule 26(f) Report (Docket No. 21) mutually set the original discovery deadline. In light of the scheduling conflicts, we suggested, and Plaintiffs agreed to extend discovery by forty-five days through and including May 15, 2013. Accordingly, we respectfully request the Court to approve this extension so that we may have sufficient time to complete discovery. This is our first request for an extension of time to complete discovery. This request will not affect other dates in this matter, as the Court has not yet issued a scheduling order.

Thank you for your consideration.

Respectfully submitted,

Andrew P. Marks /mjm

Andrew P. Marks

cc: D. Maimon Kirschenbaum, Esq. (via e-mail)
Josef Nussbaum, Esq. (via e-mail)