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February 22, 2024

VIA eCOURTS

The Honorable Judith S. Charny, J.S.C.
Superior Court – Camden County, Law Division
Camden County Hall of Justice, Courtroom 33
101 South 5th Street, 3rd Floor
Camden, NJ 08103

RE: O'Rourke v. Holtec Int't., *et al.*
No. CAM-L-1585-23

Dear Judge Charny:

We represent Defendants, Holtec International, Holtec International Power Division, and Krishna Singh ("Defendants"), in the above-referenced matter. On February 13, 2024—despite the undersigned advising Plaintiff's counsel that they were verifying discovery responses—Plaintiff filed a motion to compel discovery. The next day, February 14, 2024, the undersigned served additional information and documents on Plaintiff and requested the pending motion be withdrawn. The undersigned also served a deficiency letter regarding Plaintiff's deficient discovery responses.

On February 20, 2024, the undersigned sent a follow up email to Plaintiff's counsel requesting the pending motion be withdrawn or alternatively, consent for an adjournment request so the parties may resolve the dispute among themselves. Plaintiff's counsel consented to a one cycle adjournment so the parties can meet and confer. However, due to scheduling conflicts, the parties cannot meet and confer until March 15, 2024. Accordingly, we respectfully request this Court adjourn the pending motion to compel for two cycles, returnable March 28, 2024.

Respectfully submitted,

WHITE AND WILLIAMS LLP

James P. Anelli
Ryan T. Warden
Joseph M. Carr

cc: all counsel via eCourts