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February 23, 2024

VIA E-COURT FILING
The Honorable Judith S. Charny, J.S.C.
Camden County Superior Court
101 South 5th Street, Floor 3
Camden, New Jersey 08103

Re: Kevin O'Rourke v Holtec International, et al.
Docket No.: CAM-L-1585-23

Dear Judge Charny:

Our office represents the Plaintiff, Kevin O'Rourke, in the above-referenced matter. I am sending this letter in response to Defendants' letter filed February 22, 2024, requesting the motion day for Plaintiff's Motion to Compel be adjourned for two cycles.

Plaintiff filed a Motion to Compel certain discovery answers because after Plaintiff served discovery requests nine months ago, Defendants refused to provide a significant amount of the information and documents Plaintiff requested. After Plaintiff filed his Motion to Compel, Defendants provided additional documents, but still refused to provide a significant amount of information and documents requested. Subsequently, Plaintiff sent a letter to Defendants articulating the reasons why Defendants' responses remain deficient.

Defendants asked Plaintiff to adjourn his Motion to Compel for two cycles. Plaintiff agreed to adjourn the Motion for one cycle to attempt to resolve the outstanding issues. Plaintiff offered several days during the week of March 4, 2024, to meet and confer to discuss the outstanding discovery.

Plaintiff does not believe it is necessary to adjourn his Motion two cycles because doing so will only further delay discovery in this matter. Accordingly, Plaintiff respectfully requests this Honorable Court deny Defendants' request and adjourn the motion day one cycle. If the parties are not able to resolve the issues in that time, Plaintiff requests the Court rule on Plaintiff's Motion.

I thank the Court for its attention to this matter.

Respectfully submitted,

s/ Drake P. Bearden, Jr.
Drake P. Bearden, Jr., Esq.

cc
Joseph Carr, Esquire (via e-filing)
James Anelli, Esquire (via e-filing)
Ryan Warden, Esquire (via e-filing)