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H A D D O N M O R G A N F O R E M A N

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February 21, 2017

Via Email

Hon. Robert W. Sweet United States District Judge United States District Court Daniel Patrick Moynihan Courthouse Southern District of New York 500 Pearl Street, Room 1940 New York, New York 10007-1312

Haddon, Morgan and Foreman, P.C. Jeffrey S. Pagliuca

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Re: Giuffre v. Maxwell, 15-cv-07433-RWS

Dear Judge Sweet:

The parties write jointly to request that the Court vacate the hearing to rule on deposition objections currently scheduled for this Thursday, February 23, 2017, to a date after the Court enters rulings on other pending motions for the following reasons.

A number of legal issues currently before the Court will likely impact various portions of deposition testimony designated by the parties. In addition, the parties shortly will be filing motions *in limine* that also will impact the designated testimony. *See* ECF 455 at 2.

In the interests of judicial economy, the parties believe it would be appropriate to have the benefit of the Court's rulings on these other issues, review the designated testimony in light of such rulings and then address any unresolved designation objections.

The parties expect to submit in the next few days a proposed schedule for hearings on remaining legal issues in this matter and a revised proposed scheduling order in light of the new anticipated trial date of May 15, 2017.

Accordingly, the parties request that the Court vacate the hearing scheduled for February 23, 2017 in this case to be rescheduled by agreement of the parties and consistent with the Court's schedule.

So ordered Sweet

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Respectfully Submitted,

FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN

HADDON, MORGAN AND FOREMAN, P.C.

<u>/s/ Bradley J. Edwards</u> Bradley J. Edwards /s/ Jeffrey S. Pagliuca Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on February 21, 2017, I electronically served this *LETTER MOTION* via ELECTRONIC MAIL on the following:

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