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March 15, 2024

Supreme Court – Chemung County  
203-209 William Street  
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Attn: Hon. Christopher P. Baker

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**RE: Capreece Moore v. J.B. Hunt Transport, Inc., et al.  
Supreme Court of the State of New York, County of Chemung  
Index NO. 2023/5539**

Your Honor:

This office represents defendants J.B. Hunt Transport, Inc., Costco Wholesale Corporation, and Duke Hur (“responding defendants”). On March 14, 2024, counsel for plaintiff, Capreece Moore, filed a letter to Your Honor, alleged that responding defendants failed to respond to plaintiff’s Post Deposition Demands, and requested that Your Honor schedule a conference and/or issue an order directing defendants’ discovery compliance. We write in response to said March 14, 2024 letter.

Plaintiff failed to note that, on January 17, 2024 at 12:45 p.m., responding defendants served their responses to plaintiff’s Post Deposition Demands with an accompanying 42-page document production. See Exhibit A attached hereto. As seen in the attached document, Plaintiff’s assertion that the “deadline passed without any discovery being produced” is wholly inaccurate. Therefore, Plaintiff’s request that Your Honor schedule a conference and/or issue an order is moot.

Thank you very much for Your Honor’s attention to this matter.

Respectfully submitted,

*/s/ James A. Wescoe*

James A. Wescoe

JAW/mdp  
Attachment (Exhibit A)