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January 22, 2019

VIA FACSIMILE (518-451-8729) and U.S. Mail

Thomas D. Buchanan, J.S.C.
Supreme Court Chambers
612 State Street
Schenectady, NY 12305

Re: Coulter v. Town of Moreau, Michaels Group and Woodscape
North HOA II;
Michaels Group v. Commercial Paving Company (Third Party)
Saratoga Co. Index No. 20178; RJL No. 45-1-2017-1235
Hon. Thomas D. Buchanan

Dear Judge Buchanan:

We are the attorneys for the plaintiffs in the above action for personal injuries and damages.

On consent of all parties, the following schedule has been agreed to:

- 1. all discovery responses served by April 1, 2019;
2. all bills of particulars served by April 1, 2019;
3. the completion of all depositions by September 1, 2019;
4. the completion of all defense medical examinations of the plaintiff by October 15, 2019, with reports furnished within 45 days of each examination;
5. Plaintiffs file the trial term note of issue and certificate of readiness by January 15, 2020.

If agreeable to the Court, we request that Your Honor "so order" the enclosed.

A stamped, self-addressed envelope is enclosed for the Court's convenience in returning this letter order to me for filing and service.

Should the Court require anything further, please do not hesitate to contact me.

Partners
Cynthia S. LaFave, Esq.
Jason A. Frament, Esq.

Of Counsel
Paul H. Wein, Esq.
Bruce A. Sutphin, Esq.*

Associate

Respectfully,
LaFave, Wein & Frament, PLLC
Jason A. Frament, Esq.
Email: jframent@lwflegal.com

By:

SO ORDERED

Hon. Thomas D. Buchanan, J.S.C.

ENTERED
Craig A. Hayner

ENTERED

/osc
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FEB 21 2019
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