



**FitzGerald Morris
Baker Firth**
Attorneys & Counselors

Joshua D. Lindy
Sr. Associate Attorney
jdl@fmbf-law.com

August 29, 2019

Hon. Thomas D. Buchanan
Saratoga County Supreme Court
30 McMaster Street
Ballston Spa, NY 12020

Re: Sandra Coulter et al. v. Town of Moreau, et al.
Index No.: 20178
RJ No.: 45-1-2017-1235
Our File No.: 10005-0094

FILED
2019 OCT 21 PM 4:11
SARATOGA COUNTY
CLERK'S OFFICE
BALLSTON SPA, NY

Dear Justice Buchanan:

Our office represents Defendant Town of Moreau in the above-mentioned action. Please allow this correspondence to serve as a Proposed Scheduling Order:

- All depositions to be completed by February 1, 2010
- IME to be conducted within thirty days of Plaintiff's Deposition
- IME report to be exchanged within 45 days of exam
- Plaintiff to File Note of Issue by 5-1-20
- Dispositive Motions to be filed per CPLR
- Plaintiff's Expert Disclosure 90 days before trial
- Defendants' Expert Disclosure 60 days before trial

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SEP - 4 2019
SARATOGA COUNTY
SUPREME & COUNTY COURTS

If the above schedule is acceptable please sign below and return to the undersigned in the enclosed pre-paid envelope for filing.

Very truly yours,

Joshua D. Lindy

ENTERED
Craig A. Hayner

Saratoga County Clerk

So Ordered:

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

ENTERED
2019 OCT 21 PM 4:11
SARATOGA COUNTY
CLERK'S OFFICE
BALLSTON SPA, NY

cc: counsel for all parties via email

SERVICE BY FAX NOT ACCEPTED

Glens Falls Office: 68 Warren Street P.O. Box 2017 Glens Falls, NY 12801 | Hudson Falls Office: 3019 State Route 4, Hudson Falls, NY 12839

