## FILED: SARATOGA COUNTY CLERK 01/06/2021 11:35 AM

NYSCEF DOC. NO. 56

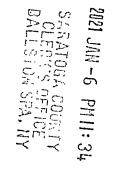


December 29, 2020

Nicole Haimson (518) 449-8893 Nicole.Haimson@wilsonelser.com

VIA MAIL

Hon. James E. Walsh, J.S.C Saratoga County Supreme Court Saratoga County Municipal Center 20 McMaster Street Ballston Spa, NY 12020 ChambersJWalsh@nycourts.gov



3

FILED

Re: Sandra Coulter and Stephen Coulter v. Town of Moreau et al. Index No. 20178 RJI No. 45-1-2017-1235 Our File No. 12072.00723

Dear Your Honor:

We represent Defendant/Third-Party Defendant, Commercial Paving Company, LLC in the above-referenced matter.

Defendant Town of Moreau's motion for summary judgment is currently pending before the Court and presently returnable on January 11, 2021. We believe the parties are making progress toward a settlement which would negate the need for any opposition to the Town's motion, but require more time to finalize the terms of any settlement.

As such, we have requested, and counsel for the Town of Moreau, has consented, to extend the return date for the Town's motion by 30 days, to February 10, 2021. If this new return date is acceptable to the Court, kindly so order below.

Very truly yours,			
	MOSKOWITZ EDELMAN &	DICKER LLP	JAN -6
Nicole Haimson NEH/smb	ENTERED Craig A. Hayner Chaig A. Hayner	SO ORDERED: Hon James E. Walsh, J.S.	PHII: 34
Albany • Allanta • Austin	Saratoga County Clerk reat Oaks Boulevard, Suite 228 • Alb Baltimore • Beaumont • Boston • Chicago • Dalk s Angeles • Miami • Michigan • Milwaukee • New San Francisco • Sorasoto • Stomford • Virginia	as • Denver • Edwardsville • Garden City • Hartf	ord • Houston • Indiana • Kentucky hiladelphia • Phoenix • San Diego

Find authenticated court documents without watermarks at docketalarm.com.

## FILED: SARATOGA COUNTY CLERK 01/06/2021 11:35 AM

NYSCEF DOC. NO. 56

RECEIVED NYSCEF: 02/24/2021



- 2 -

CC: Shawn Nash, Esq. Shawn.nash@selective.com

> Amina Karic, Esq. <u>AKaric@lwflegal.com</u>

Timothy Horigan, Esq. th414@horiganlaw.com

James P. Craig, Esq. jpc@browncraighunt.com

Joshua D. Lindy, Esq. jdl@fmbf-law.com



Find authenticated court documents without watermarks at docketalarm.com.