

MARSCHHAUSEN & FITZPATRICK, P.C.  
 ATTORNEYS & COUNSELORS AT LAW  
 73 Heitz Place  
 Hicksville, New York 11801  
 (Tel) 516 747-8000 and 516 877-7700  
 (Fax) 516 747-6439  
[mail@marschfitz.com](mailto:mail@marschfitz.com)

November 28, 2022

**BY NYSECF MAIL**

Hon. Christopher P. Baker  
 Supreme Court Schuyler County  
 203 Lake Street  
 P.O. Box 588  
 Elmira, NY 14902

Re: New York Municipal Insurance Reciprocal v. Wilbri Inc. et al.  
 Index No.: E2022-0005

Dear Justice Baker:

We are counsel to plaintiff New York Municipal Insurance Reciprocal in the above-referenced matter. Pursuant to the Preliminary Conference Order plaintiff was ordered to file a Note of Issue on or before today. Unfortunately, although paper discovery is complete, depositions have not been completed. Accordingly, please allow this letter to serve as a joint request to enlarge the time to complete discovery until January 31, 2023 and to enlarge the time to file a Note of Issue until some date thereafter.

Thank you in advance for your courtesy in this matter.

Very truly yours,

Marschhausen & Fitzpatrick, P.C.



Kevin P. Fitzpatrick, Esq.  
[kfitzpatrick@marschfitz.com](mailto:kfitzpatrick@marschfitz.com)

KPF/km

Cc: David M. Goodman, Esq.  
 By email: [dgoodman@gerberciano.com](mailto:dgoodman@gerberciano.com)

*A GRANTED  
 A PLAINTIFF TO FILE A  
 Note of ISSUE on or before  
 2/15/23  
 "Order"*