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January 26, 2023

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. I write with the consent of Joshua Rubin, counsel for defendant Wilbri Inc., seeking a further extension of discovery. Pursuant to this Court's Order discovery was to be completed by January 31, 2023 and plaintiff was expected to file a Note of Issue by February 15, 2023. Although only depositions remain, the parties have been engaging in attempts to settle this matter and request a further extension to either finalize settlement or complete the depositions.

Accordingly, please allow this letter to serve as a joint request to enlarge the time to complete discovery until March 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.
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GRANTED
** All discovery to be completed by 3/31/23*

KPF/km
** Plaintiff to file A Note of Issue on or before 4/14/23*

" M P. BAKER

Cc: Joshua Rubin, Esq.
By email: jrubin@gerberciano.com