

January 31, 2019

By E-filing

Hon. Jennifer G. Schechter
New York State Supreme Court
60 Centre Street, Room 228
New York, New York 10007

Re: *Summer Zervos v. Donald Trump*, Index No. 150522/2017

Your Honor:

This firm represents Plaintiff Summer Zervos. We submit this letter to request an extension of the deadline for party and non-party depositions. The current Scheduling Order provides today as the deadline for party depositions, and February 28, 2019 as the deadline for non-party depositions. (NYSCEF Doc. No. 166).

As discussed with the Court on recent calls, in light of the fact that the deadline for the exchange of ESI discovery is now February 20, 2019, we respectfully request that the deadlines for depositions be extended as well. Plaintiff has proposed April 19, 2019 as the new deadline for party depositions, and May 31, 2019 as the deadline for non-party depositions, dates that we believe are reasonable in light of the fact that a majority of paper and ESI discovery has already been exchanged, this is not a document-intensive case, and discovery has already been delayed a number of times. Defendant's counsel had proposed the following deadline when we made an initial proposal of March 31, 2019 as the deadline for party depositions: the end of June. Defense counsel has not specifically responded to the compromise schedule we list above (April 19, 2019/May 31, 2019), because they say they have not had sufficient time to confer internally about their position. We seek the Court's guidance on setting new dates.

Separately, the Parties are in the process of executing the final ESI Protocol and we hope to submit it to the Court by early tomorrow.

Respectfully submitted,

/s/ Mariann Meier Wang

Mariann Meier Wang

cc: All Counsel, via ECF