

September 27, 2021

VIA E-FILING

Hon. Paul I. Marx
Rockland Supreme Court
One South Main Street
New City, New York 10956

Re: **Emmis Radio v. William Benson Group, LLC**
Index No.: 034577/2020

Dear Hon. Marx:

Our firm is counsel to Defendant in connection with the above referenced matter.

We are in receipt of counsel's letter to the court of Friday afternoon on September 24, 2021. Although we are aware that the court is not inclined to get into day-to-day disputes, we feel compelled to at least respond for the record.

I shall note once again, I did not receive any phone calls or emails from counsel prior to the filing of the letter. Not only is this improper, but I find it borderline unprofessional.

Defendant has produced three sets of discovery responses to date, that is August 31, 2021, September 17, 2021, and also a third production dated today which includes documents just received last week and early this morning. Counsel is merely attempting to manufacture discovery issues. We submit that the parties are ready to proceed with depositions.

Your time and attention to this matter are greatly appreciated.

Respectfully yours,

PEYROT & ASSOCIATES, PC

By: /s/ David C. Van Leeuwen
David C. Van Leeuwen, Esq.

Cc: Joesph I. Terkell, Esq. (via NYSCEF)