

# KAPLAN HECKER & FINK LLP

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May 5, 2022

## VIA ECF

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
500 Pearl Street  
New York, New York 10007

*Re: Carroll v. Trump, 20-cv-07311 (LAK) (JLC)*

Dear Judge Kaplan:

I write on behalf of all parties concerning the status of discovery in this litigation.

On April 1, 2022, Defendant proposed—and Plaintiff agreed—that the parties resume discovery in this case. (Fact discovery started in state court in January 2020, but the parties had only begun exchanging written discovery when the case was removed to federal court.)

The parties have met and conferred, and they respectfully propose the following schedule:


- The parties shall serve any and all written discovery requests on each other on or before May 27, 2022.
- The parties shall substantially complete their productions of written discovery and requests for inspection or examination on or before August 3, 2022.
- Depositions to take place between August 3, 2022, to October 19, 2022.
- The parties shall make any and all expert disclosures under Rule 26(a)(2) on or before September 16, 2022.
- The parties shall substantially complete any and all fact discovery on or before October 19, 2022.
- The parties shall complete any and all expert discovery on or before November 16, 2022.

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Although the parties served initial written discovery requests in the state proceedings, the parties are in agreement on serving new written discovery requests, and further agree that they will serve such written discovery requests on each other by May 27, 2022.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Roberta A. Kaplan", with a long, sweeping flourish extending to the right.

Roberta A. Kaplan