Ballard Spahr

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Via CM/ECF

March 12, 2016

William T. Walsh, Clerk United States District Court M.L. King, Jr. Fed. Bldg. & U.S. Cthse. 50 Walnut Street Newark, New Jersey 07102

Re:

Am. Bd. of Internal Med. v. Jaime Salas Rushford, M.D. Civil Action No. 2:14-cv-06428-KSH-CLW United States District Court for the District of New Jersey – Newark Vicinage

Dear Mr. Walsh:

This firm represents plaintiff/counterclaim defendant the American Board of Internal Medicine and third-party defendants Richard Baron, M.D., Christine K. Cassel, M.D., Lynn O. Langdon, Eric S. Holmboe, M.D., David L. Coleman, M.D., Joan M. Feldt, M.D., and Naomi P. O'Grady, M.D. (collectively, "ABIM") in the above referenced case.

On March 11, 2016, defendant Jaime A. Salas Rushford, M.D. filed a motion pursuant to *Fed. R. Civ. P.* 12(c) to dismiss ABIM's complaint for failure to state a claim upon which relief can be granted [Dkt. Entry No. 76]; that motion was noticed as returnable on April 4, 2016. As a result, under *L. Civ. R.* 7.1(d)(1)-(3), ABIM's opposition thereto is due on or before March 21, 2016, and a reply, if any, is due on or before March 28, 2016.

Pursuant to *L.Civ.R.* 7.1(d)(5), kindly accept this letter as ABIM's request for an automatic adjournment of the April 4, 2016 return date from April 4, 2016 to the next available motion day following the originally noticed date, or April 18, 2016. As a result, ABIM's opposition to defendant's *Rule* 12(c) motion to dismiss ABIM's complaint for failure to state a claim upon which relief can be granted is now due on or before April 4, 2016, and a reply, if any, is due on or before April 11, 2016. Please further note that the originally noticed April 4, 2016 return date on this motion has not previously been extended or adjourned.

Thanking you in advance for your courtesies in this matter, I remain,

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Very truly yours,

BALLARD SPAHR LLP

By: Roberto A. Rivera-Soto

cc: To all counsel of record (VIA CM/ECF)