

Bowles Crow Lutzer & Newman LLP

54 West 21st Street, Suite 1007
New York, New York 10010
tel: 646.419.4264 fax: 866.844.8305
www.bowlescrow.com

Samantha H. Lutzer
Attorney at Law
646.374.0351
sam@bowlescrow.com

New York
Los Angeles

January 23, 2012

Filed by ECF

The Hon. Patty Shwartz
United States Magistrate Judge
USDC, District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: Status Conference
Patrick Collins, Inc. v. Hitchcock et al, Case No. 2:11-04203 (FSH) (PS)
K-Beech, Inc. v. Booth et al., No. 11-cv-04776 (FSH)(PS)

Dear Judge Shwartz:

We represent the plaintiff in the two above captioned matters. We write to inform the Court that we have complied with the Court's Order to serve Rule 26(a) disclosures and to file a discovery plan by 1:00 pm today. We are submitting the discovery plan for plaintiff K-Beech Inc., as Plaintiff's discovery plan, because we were unable to confer with all of the Defendants or their attorneys prior to the Court's deadline. We did contact all of the attorneys for the represented Defendants and the unserved *pro se* Defendants by mail and telephone.

We are submitting the discovery plan for plaintiff Patrick Collins Inc., as a joint discovery plan, because we were able to confer with counsel for unserved Defendant Jeff Hitchcock (John Doe 9). However, we were unable to confer with all other Defendants or their attorneys prior to the Court's deadline. We did contact all of the attorneys for the represented Defendants and the unserved *pro se* Defendants by mail and telephone.

We will continue to work prior to the Court conference to be as efficient as possible with the Court's resources at the status conference this Thursday.

Respectfully submitted,

/s/ Samantha H. Lutzer
Samantha H. Lutzer (SE0898)