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March 16, 2018

Honorable Joel H. Slomsky James A. Byrne U.S. Courthouse, Room 13614 Eastern District of Pennsylvania 601 Market Street Philadelphia, PA 19106-1748

BY FAX (267-299-5058)

RE: Doe I, et al. v. Blocker, U.S.D.C., E.D. Pa., No. 2:16-cv-6039-JHS

Dear Judge Slomsky:

This firm represents Plaintiffs, John Doe I and John Doe II ("Plaintiffs"), in connection with the above-referenced matter. On November 3, 2017, Plaintiffs served discovery requests upon Defendant, Commissioner of the Pennsylvania State Police, Col. Tyree V. Blocker ("Defendant"). Defendant has not provided full and complete responses. On several occasions, the parties met and conferred. In particular, on February 26, 2018, after discussing the discovery that remains outstanding, Plaintiff agreed to allow Defendant an additional two weeks to furnish complete responses. The two weeks expired on Tuesday, March 13, 2018. Defendant has neither provided additional responses, nor contacted counsel for Plaintiffs.

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Before resorting to motions practice to resolve this discovery impasse, Plaintiffs seek to request a telephone conference with the Court and opposing counsel. Yesterday, per your policies and procedures, Plaintiffs' counsel contacted Judicial Assistant Kelly Ann Haggerty. She advised counsel to send this letter via facsimile, requesting the teleconference.

We appreciate Your Honor's consideration and understanding of the situation. Please do not hesitate to contact me, or any of my colleagues, with questions or concerns.

Respectfully,

Jonathan S. Goldstein, Esq.

cc: Kathy Le, Esq. (via email, kle@attorneygeneral.gov)
John Sweeney, Esq. (via email, JSweeney@bradley.com)