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VIA ELECTRONIC MAIL

October 23, 2015

Marco A. Gonzalez, Jr., Esq.
Nicoll Davis & Spinella LLP
95 Route 17 South – Suite 316
Paramus, New Jersey 07652

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

Dear Mr. Gonzalez:

This firm represents plaintiff/counterclaim defendant the American Board of Internal Medicine (“ABIM”) 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, the “ABIM individuals”) in the above referenced case.

In that capacity, we are in receipt of defendant’s first set of interrogatories dated October 14, 2015. Please note that those interrogatories, including all discrete subparts, exceed the limit of not more than 25 interrogatories set forth in Fed. R. Civ. P. 33(a)(1). For that reason, and in the absence of direction as to which 25 interrogatories -- including all discrete subparts -- require a response, we are unable to respond to the interrogatories as a whole. Therefore, before responding, we will await the reissuance of interrogatories that conform with the plain limitations and requirements of the Rules.

Looking forward to defendant’s reissued and compliant interrogatories, I remain,

Very truly yours,

BALLARD SPAHR LLP

By:



Roberto A. Rivera-Soto

A PA Limited Liability Partnership | John B. Kearney, Managing Partner