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VIA HAND DELIVERY

COURTESY COPIES

May 31, 2016

The Honorable Cathy L. Waldor
United States Magistrate Judge
M.L. King, Jr. Fed. Bldg. & Cthse.
Room 4040
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

Dear Magistrate Judge Waldor:

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.

Enclosed please find a true and correct courtesy copy of ABIM's opposition (memorandum, exhibits, certification of counsel, and proposed form of order) to the motion for a protective order filed on May 26, 2016 by defendant/counterclaim plaintiff/third-party plaintiff Jaime A. Salas Rushford, M.D. Although this motion is returnable on June 20, 2016, we filed this opposition on short notice in the hope the Court will address this motion at the June 3, 2016 conference.

Looking forward to appearing before the Court to address this motion, I remain,

Respectfully yours,

BALLARD SPAHR LLP

By: 

Roberto A. Rivera-Soto

encls.

cc(w/o encls.): Andrew L. Schlafly, Esq. (VIA ELECTRONIC MAIL)

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