

# Ballard Spahr LLP

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**VIA ELECTRONIC AND ORDINARY MAIL**

April 22, 2016

Andrew L. Schlafly, Esq.  
939 Old Chester Road  
Far Hills, New Jersey 07931

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. Schlafly:

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.

As a further follow-up to our meet-and-confer, enclosed please find ABIM's supplemental objections and responses to defendant's first set of interrogatories.

Very truly yours,

**BALLARD SPAHR LLP**

By: 

Roberto A. Rivera-Soto

encl.

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

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