

Ballard Spahr LLP

1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
TEL 215.665.8500
FAX 215.864.8999
www.ballardspahr.com

Tyler Marandola
Tel: 215.864.8628
Fax: 215.864.8999
marandolat@ballardspahr.com

March 17, 2016

By Federal Express

Andrew L. Schlafly
939 Old Chester Rd.
Far Hills, NJ 07931

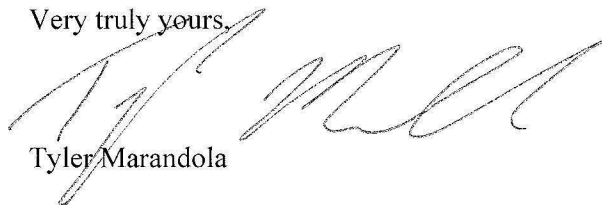
Re: ***AM. BD. OF INTERNAL MED. V. JAIME SALAS RUSHFORD, M.D.***
Civil Action No. 2:14-cv-06428-KSH-CLW
United States District Court for the District of New Jersey

Dear Mr. Gonzalez:

With this letter, Plaintiff American Board of Internal Medicine is producing documents in response to Defendant Jaime Salas Rushford's First Request to Plaintiff for Production of Documents and Things. They are labeled ABIM01396 through ABIM02400.

ABIM has additional documents that it is withholding because the parties have not yet agreed to the entry of an appropriate protective order. In its letter to Mr. Gonzalez on January 12, 2016, ABIM proposed that the parties agree to the standard discovery confidentiality order provided in Appendix S to the Local Rules for the District of New Jersey. Defendant has not yet responded to that suggestion. Please let ABIM know at your earliest convenience whether Defendant will consent to entry of the standard confidentiality order.

Very truly yours,



Tyler Marandola

TM/cmm

Enclosures

DMEAST #24695810 v1