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February 1, 2013

The Hon. Douglas E. Arpert, U.S.M.J.  
United State District Court  
Clarkson S. Fisher Federal Building & U.S. Courthouse  
Room 6000  
402 East State Street  
Trenton, NJ 08608

Re: Lemont Love v. South River, et al.  
Dkt. No. 11-3765 (AET)

Dear Judge Arpert:

As you may recall, I am serving as counsel to plaintiff Lemont Love. I am writing to request an order permitting the deposition of Mr. Love on February 27, 2013. This date has been adjourned from an earlier date due to my schedule.

The nature of my solo practice is such that my schedule for January and February has been extremely crowded. I have requested and received cooperation from defense counsel so that I may give proper attention to my other litigation matters as well as this case. I am requesting that Mr. Love's deposition be set for February 27, 2013, a date agreed upon by defense counsel.

I have also discussed a 45-day extension of discovery with defense counsel and have their consent. The parties have been engaged in paper discovery so the discovery period to date has been productive. I am requesting that the Court extend discovery from February 28, 2013 to April 15, 2013 so that I may give appropriate attention to my other litigation matters as well as completing discovery in this case.

I have enclosed forms of order on both matters that reflect my communications with defense counsel.

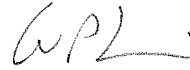
February 1, 2013

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Thank you for your consideration in this regard.

Sincerely,  
LAW OFFICE OF  
WILLIAM P. FLAHIVE, L.L.C.

By:



William P. Flahive

Enclosures

cc: Lemont Love, # 331321C (via regular mail)  
Arthur Thibault (via ECF)

WILLIAM P. FLAHIVE  
LAW OFFICE OF WILLIAM P. FLAHIVE, L.L.C.  
Attorney for Plaintiff Lemont Love  
24 Arnett Avenue  
Suite 103  
Lambertville, NJ 08530  
(609) 397-6390

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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LEMONT LOVE	)	
	)	Civil Action No. 11-3765 (AET)
Plaintiff,	)	
	)	<b>ORDER</b>
v.	)	
	)	
JOHN DOE 1, et al.,	)	
Defendants.	)	

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This matter having come before the Court upon the application of Defendants, with the consent of William P. Flahive, counsel for Plaintiff LeMont Love (“Plaintiff”), for an Order pursuant to Fed. R. Civ. P. 30(a)(2)(B) for leave to take the deposition of Plaintiff who is confined at Northern State Prison in Newark, New Jersey, and the Court having considered the matter and good cause having been shown,

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2013, hereby

**ORDERED** that pursuant to Fed. R. Civ. P. 30(a)(2)(B), Defendants, by and through their counsel, Apruzzese, McDermott, Mastro and Murphy, P.C., are hereby granted permission to undertake the deposition of Plaintiff at Northern State Prison in Newark, New Jersey, on the 27<sup>th</sup> day of February 2013, beginning at 9:00 o’clock in the

forenoon and continuing for up to seven (7) hours in accordance with Fed. R. Civ. P. 30(d)(1); and it is further

**ORDERED** that the parties to this litigation and William Flahive, counsel for Plaintiff, are granted permission to attend Plaintiff's deposition; and it is further

**ORDERED** that a Court Reporter from D'Amico Certified Shorthand Reporting, LLC, retained by Defendants, may bring into Northern State Prison a stenographer machine and lap top computer, which are required to record and transcribe Plaintiff's deposition; and it is further

ORDERED that this Order shall be served upon all parties within \_\_\_\_ days; and it is further

ORDERED that a copy of this Order be served upon the Administrators of Northern State Prison within \_\_\_\_ days of the date of this Order.

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Douglas E. Arpert, U.S.M.J.

WILLIAM P. FLAHIVE  
LAW OFFICE OF WILLIAM P. FLAHIVE, L.L.C.  
Attorney for Plaintiff Lemont Love  
24 Arnett Avenue  
Suite 103  
Lambertville, NJ 08530  
(609) 397-6390

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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LEMONT LOVE	)	
	)	Civil Action No. 11-3765 (AET)
Plaintiff,	)	
	)	<b>ORDER</b>
v.	)	
	)	
JOHN DOE 1, et al.,	)	
	)	
Defendants.	)	
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This matter having come before the Court upon the application of the Plaintiff by William P. Flahive, counsel for Plaintiff LeMont Love (“Plaintiff”), for an Order extending discovery by 45 days, and consent having been given by defendants through counsel Apruzzese, McDermott, Mastro and Murphy, P.C., and the Court having considered the matter and good cause having been shown,

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2013, hereby

**ORDERED** that discovery is extended 45 days and will now close April 15, 2013.

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Douglas E. Arpert, U.S.M.J.