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January 20, 2009

VIA HAND DELIVERY

Michael M. Buchman, Esq.
c/o Pomerantz Haudek Block Grossman & Gross LLP
100 Park Avenue
26th Floor
New York, NY 10017


Re: *Lucker et al. v. Bayside Cemetery & Congregation Shaare Zedek*,
No. 07 Civ. 3823 (RJD) (JMA)
Cohen v. Bayside Cemetery & Congregation Shaare Zedek,
No. 08 Civ. 3555 (RJD) (JMA)
Goldstein v. Bayside Cemetery & Congregation Shaare Zedek,
No. 08 Civ. 3923 (RJD) (JMA)

Dear Michael:

Enclosed please find jurisdictional discovery requests addressed to your respective clients. Each of the requests has been made returnable on February 12, 2009, so as to be complete before we were instructed to contact chambers for further briefing instructions. However, if you would commit to joining us in a joint request that any further briefs be filed, and oral argument be scheduled, no earlier than February 23, 2009, we would be happy to extend the return date of these requests to the customary 30 days after service (February 19, 2009).

Please let me know if you would be amenable to such an agreement.

Sincerely,



Russell M. Steinthal

Enclosures