LAW OFFICES
KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C.
210 SUMMIT AVENUE
MONTVALE, NEW JERSEY 07645

PAUL B. GOLDHAMER * *
BARRY S. KANTROWITZ ** †
GARY S. GRAIFMAN * *
RANDY J. PERLMUTTER * *

JAY I. BRODY * *
LOUIS B. GERBER * *♮
ROBERT A. LUBITZ * * •
BRANDON W. ROTHSTEIN *
REGINALD H. RUTISHAUSER * *
WILLIAM T. SCHIFFMAN * *

OF COUNSEL
STEVEN B. ROTHSCHILD * *
JEFFREY P. ORLAN, P.A., P.C.* †

* * N.Y. & N.J. BAR
* N.Y. BAR ONLY
† FLA. BAR
• M.A. & N.H. BAR
♮ L.A. BAR

TEL # (201)391-7000
FAX # (201) 307-1086
www.kgglaw.com

NEW YORK
747 CHESTNUT RIDGE ROAD
CHESTNUT RIDGE, N.Y.10977
TEL # (845) 356-2570
FAX # (845) 356-4335

November 3, 2020

VIA Email and ECF

Cathy L. Waldor, M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Gelis, et al. v. BMW of North America, LLC*., United States District Court for the District of New Jersey, Civil Action No. 17-cv-7386-CLW

Dear Magistrate Waldor:

Last Friday, October 30, 2020, we filed a Joint Letter raising a discovery issue which we sought to have resolved before Plaintiffs were required to file their Motion for An Award of Counsel Fees ("Counsel Fee Motion"), due on December 8th, 2020.

Yesterday, we received the text order placing the matter on the calendar before Your Honor for Monday, December 21st. The parties respectfully request that the matter be conferenced before Your Honor sufficiently in advance of the deadline to file the Counsel Fee Motion on December 8th, and would request that if Your Honor could find time the week of November 16th that would be sufficiently in advance of the deadline for the motion. I understand from Christopher Dalton that he is not available on the Wednesday of that week, November 18th but counsel are available any other day that week.

Respectfully submitted,

Gary S. Graifman

GSG/mp
Cc: All Counsel of Record (*via ECF and Email Transmission*)