Mark Renart Peck 023121995 91 LARRY HOLMES DR EASTON PA 18042 **Superior Court of New Jersey Civil Division, Civil Part**Warren County

David P Morrisette, Sandra S Morrisette vs.

Townofphillipsburgtowncouncil, Peron Construction, Inc.

Docket No. WRN-L-000378-24

Civil Action

Adjournment Request

- 1) I, Mark Renart Peck, am the attorney for Peron Construction, Inc..
- 2) I request an adjournment of the Motion Hearing scheduled on 04/25/2025 at 9:00am before Michelle Smith.
- 3) The new date proposed for the Motion Hearing is 05/09/2025.
- 4) I have attempted to contact all counsel or parties.
- 5) I have consent of all parties to adjourning the Motion Hearing.
- 6) I have consent of all parties to the new date proposed for the Motion Hearing.
- 7) I request this adjournment because: Two motions currently pending. move discovery motion one cycle.

/S/ Mark Renart Peck



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April 8, 2025

Via ECourts Only

Hon. Veronica Allende, J.S.C. Somerset County Courthouse 20 North Bridge Street Somerville, New Jersey 08876

Re: <u>David P. Morrisette, et al v. Town of Phillipsburg</u>

Docket No. WRN-L-378-24

Discovery Motion – Adjournment Request

Dear Judge Allende:

As you will recall, I represent Peron Construction in the above-referenced matter. The Plaintiffs in this case have recently filed a motion seeking to take discovery, which is presently returnable April 25, 2025. There are two other motions presently pending, Peron's motion to dismiss Complaint Count Four returnable April 11 and Plaintiffs' motion for reconsideration returnable April 25. Inasmuch as the outcome of either of these motions could render the discovery motion moot, we think it prudent to adjourn the discovery motion one cycle, so same would be returnable May 9. Accordingly I am making that request, to adjourn the return date one cycle. I have conferred with Plaintiffs' counsel, Peter Dickson, Esq., and he concurs with this request.

Thank you for your courtesies in this regard.

Respectfully submitted,

1s/ Mark R. Peck

Mark R. Peck

MRP:te

cc: counsel