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May 13, 2011

Mitchell B. Seidman, Esq.  
Seidman & Pincus, LLC  
777 Terrace Avenue  
Fifth Floor  
Hasbrouck Heights, New Jersey 07604

RE: Barrett v. Care Plus NJ, Inc.  
DOL: January 12, 2009  
Our File No. 9861-SCJ

Dear Mr. Seidman:

Please be advised that this defendant, Care Plus of New Jersey hereby amends its answers to interrogatories to include the plaintiff's medical records from Bergen Regional Medical Center, which were previously served upon all counsel by Brian M. Buffalino of Hardin, Kundla, McKeon & Poletto, under cover of April 25, 2011. Defendant will rely on the medical records of Bergen Regional Medical Center for the purposes of trial.

Please be advised, however, that same is furnished with the specific understanding that it does not constitute an adoptive admission as referenced in Sallo v. Sabitino, 146 N.J. Super. 416 (App. Div. 1976), cert. denied 75 N.J. 24 (1977) and Skibinski v. Smith, 206 N.J. Super. 349 (App. Div. 1985).

Unless I hear from you to the contrary within five (5) days, I will assume that this method of amending my client's answers to interrogatories is acceptable to you.

Thank you for your courtesies in this regard.

Very truly yours,

FAUST GOETZ SCHENKER & BLEE

By:

David W. Gannon

DWG:sdd  
Enclosure

cc: Paul Daly, Esq.  
Hardin, Kundla, McKeon & Poletto