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October 31, 2022

VIA E-FILING

Hon. Louis S. Sceusi, J.S.C.
Morris County Superior Court
Washington & Court Streets
P.O. Box 910, 2nd Floor
Morristown, New Jersey 07963

**RE: Lauren Kanarek v. Sweet Grass Farm, LLC, et al.
Docket No.: MRS-L-2250-19**

Dear Judge Sceusi:

As you are aware, this firm represents Defendant, Sweet Grass Farm LLC (“SGF” or “Defendant”) with regard to the above-captioned matter.

We are in receipt of Plaintiff’s October 31, 2022, letter requesting an adjournment of the November 4, 2022, oral arguments scheduled in this matter and write to strenuously object to same.

Plaintiff’s request for an adjournment is just another step in a concerted and deliberate strategy to delay discovery in this case. The motions at issue were first returnable on September 9, 2022, and discovery has been otherwise stalemated until these pending issues are resolved. For a group of people that claim they have nothing to hide, they take every opportunity to obstruct the orderly administration of this case.

Plaintiff claims she wants the adjournment because Jonathan and Kirby Kanarek are out of the country. That should be of no moment because Jonathan and Kirby Kanarek waived their right to be heard at this hearing. The law firm of Nagel Rice does not represent Jonathan and Kirby Kanarek. Jonathan and Kirby Kanarek failed to submit papers in opposition to these motions. Therefore, technically their presence is not needed as they should not be permitted to speak at the hearing. Even if the Court is inclined to relax the rules for these non-party witnesses, the hearing is being conducted by Zoom. If there is one thing the pandemic has taught the legal community it is that a motion hearing can be conducted with the participants being almost anywhere. Being “out of the country” (for apparently over a month) is not a valid reason to adjourn.

Finally, even if the Court is inclined to adjourn the two Motions for Contempt against Jonathan and Kirby Kanarek, SGF implores the Court to NOT adjourn the motions involving the

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Plaintiff and her utter refusal to appear for a deposition. Her discovery violations are separate and distinct from her parents and do not require her parents to resolve. Adjourning that motion would demonstrably harm the Defendants and their efforts to comply with the discovery deadlines in this case.

We thank the Court for its attention to this matter.

Respectfully submitted,

SCHENCK PRICE SMITH & KING LLP

/s/ Mark K. Silver

Mark K. Silver

MKS/

Enc.

cc: All Counsel of Record (via e-filing)