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May 13, 2021

Shelley Ann Quilty-Lake, Esq.
Meenan & Associates, LLC
299 Broadway
Suite 1310
New York, New York 10007

Re: *Gayle v. Harry's Nurses Registry, Inc.*
and *H. Dorvilier*, Case No. 1:07-cv-04672 and
McFarlane v. Harry's Nurses Registry, Inc., *Harry's*
Home Care, Inc. and *H. Dorvilier*, Case No.
1:17-cv-6350: Letter Request/Motion to Remove
Administrative Case Closure Status And Reinstate
Cases to EDNY Active Docket Until The Filing Of
Satisfactions Of Judgment And/Or Judgments
Adjudicating All claims And Liabilities

Dear Ms. Quilty-Lake

This will acknowledge receipt of your email correspondence dated May 12, 2021 and confirm that I have no intention of withdrawing my pending Motion to Remove Administrative Case Closure Status and Reinstate Cases to EDNY Active Docket (hereinafter "the Motion").

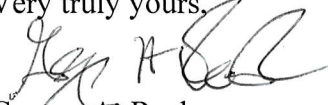
In my view, your threat of sanctions is unwarranted and unprofessional. This motion simply focuses on the administrative status of these cases and in no way raises issue with the "finality" of the orders or judgments referenced in your note. Further, contrary to your assertions, there is no intent or "design" on my part to harass Plaintiffs. I have simply asked that these cases be restored to the EDNY active docket until they are in fact closed through the filing of a satisfaction of judgment or other judgments indicating that all claims and liabilities have been adjudicated. In your note you reference several documents that have been filed in the Gayle docket and it should be noted for the record that the docket in the Gayle case indicates that it was "closed/terminated" on September 19, 2012 (ECF 179) -- even though some one hundred and twelve (112) documents have been filed in the case docket since that date (the instant motion is identified as ECF 292). The volume of activity over a nine (9) year period further suggests that this case has been active and its "closed" designation was assigned for administrative purposes.

Should you decide to file a motion for sanctions under Rule 11 I will respond accordingly. I would suggest however, that your efforts in this regard appear to be a bit extreme and, in my opinion, constitute a poorly disguised attempt to intimidate my client, saddle him with additional costs and divert the Court from the substantive issues that are raised in the instant motion.

research that was conducted in good faith. Regarding your response to the instant motion, I further suggest that any such response on behalf of the Plaintiffs is provided at your option and if you wish to raise substantive legal issues relating thereto, your response should be provided on the record.

In the interests of transparency, your note of May 12, 2021 has been attached hereto and this letter has been copied to Judge Judges Garuafis and Chen to make sure that your note and my response become part of the Gayle and McFarlane Court dockets.

Very truly yours,



George A. Rusk