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April 17, 2025
Via ECF

Honorable Alan S. Trust
Chief United States Bankruptcy Judge
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
290 Federal Plaza
Central Islip, New York 11722

**RE: Howard M. Ehrenberg in his Capacity as Liquidating Trustee of Orion
Healthcorp, Inc., et al. v. Parmar, et al.,**

Adv. Proc. No. 18-08053

Dear Judge Trust:

I represent defendant Paul Parmar and related defendants in the above-referenced adversary proceeding. Pursuant to E.D.N.Y. LBR 7007-1, I write to request a conference in an effort to resolve an impasse regarding discovery. Simply stated, my client is under indictment in the United States District Court for the District of New Jersey (2:18-cr-00735-MCA-1) and the allegations in the indictment are parallel to the allegations of the complaint in this matter. Trial in the criminal case is scheduled to commence on June 10, 2025. Mr. Parmar, through his criminal defense counsel, requested an adjournment of the criminal trial and the request was denied by Order of April 2, 2025.

Plaintiffs have noticed the deposition of my Mr. Parmar and served Rule 30(b)(6) deposition notices for each of the related entities, triggering a request for the designation of a person with knowledge to appear. The only person with the requisite knowledge is Mr. Parmar.

I have solicited the consent of the plaintiffs to a stay of discovery pending the outcome of the criminal trial and we discussed the matter this week to no avail. The results of that trial, for better or worse from the perspective of all parties, will have an effect on the adversary proceeding, perhaps even an entirely dispositive effect. There are many common issues of fact. Conducting a deposition of Mr. Parmar at this juncture would be prejudicial to his interests and given the imminency of his criminal trial, a brief pause in discovery would be a relative inconvenience as compared to the prejudice Mr. Parmar would suffer.

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Plaintiffs disagree. They will speak for themselves, but my understanding of their position is that this matter is old and the claims against my clients are the only remaining issues in this proceeding. On balance, I contend that the prejudice to my client outweighs any to be suffered by the plaintiffs.

Brigette Rose, Esq. and I have discussed this matter. We communicate professionally, cordially and in good faith. We nevertheless are truly at a standoff on this issue and, aside from the fact that this request is a sine qua non to the filing of a motion, we are hoping that insight from Your Honor might obviate the need for motion practice.

I therefore request that Your Honor grant this request and schedule a conference to discuss these issues. I will be away out of the country on vacation tomorrow and next week but if necessary, can appear telephonically.

Thank you for your consideration.

Respectfully yours,

/s/ Timothy P. Neumann

cc: client