

MICHAEL M. BUCHMAN

September 9, 2008

VIA ELECTRONIC MAIL

Stephen M. Axinn, Esq.
Axinn Veltrop & Harkrider LLP
114 West 47th Street
New York, NY 10036

Re: Congregation Shaare Zedek/Bayside Cemetery

Dear Mr. Axinn:

This will acknowledge receipt of yours dated September 5, 2008, requesting documents and information concerning Ms. Lynn Cohen's family members buried at Bayside Cemetery.

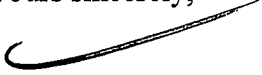
As you know, Plaintiffs have previously requested that formal discovery be commenced in this matter. You and your client have repeatedly rejected our efforts in this regard.

It is ironic that you now seek discovery from us.

We will not provide the requested information based upon your prior position that discovery has not commenced in this case.

Please feel free to contact me if you wish to discuss this further.

Yours sincerely,



Michael M. Buchman

c: John Lucker
Elizabeth Lucker
Nancy Rousseau
Steven Cahn, Esq.
Ethan Klingsberg, Esq.