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Via ECF filing

Hon. Shelley C. Chapman  
U.S. Bankruptcy Court  
One Bowling Green  
New York, NY 10004

Re: Sonja Tremont-Morgan  
Case No. 10-16132  
STAM LLC  
Case No. 11-10090

Dear Judge Chapman:

I am writing to advise of an unavoidable delay in submission of papers, which we expect to file on Monday, March 21, 2011.

A hearing is scheduled for Tuesday, March 22, 2011 at 11:00 a.m. on the motion of Hannibal Pictures, Inc. to dismiss both of the above referenced related cases, or in the alternative for the appointment of a Chapter 11 trustee, as well as the motions of the debtors for joint administration of the cases.

As counsel for the debtors we have been working on reply papers to Hannibal's motion, and a response to objection filed by Hannibal to the motions of the debtors. We have been delayed in completing our papers because for the past two weeks Ms. Morgan has been actively engaged in a mediation and then an arbitration in California on her malpractice claims against the attorneys who represented her in the litigation with Hannibal. Accordingly, she has not been available to assist in the preparation of the papers.

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March 18, 2011

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We do intend to file papers with respect to both motions, and anticipate putting them on the Court's ECF system and serving them on counsel for Hannibal on Monday. We apologize for the delay, and we will work out any accommodation which may be needed with Hannibal's counsel, who has been more than accommodating himself.

Respectfully yours

A handwritten signature in black ink, appearing to read "J. Ted Donovan", with a long horizontal flourish extending to the right.

J. Ted Donovan

Cc: Robert N. Michaelson, Esq.