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MEMO ENDORSED

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|--|--|
| Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

Via Facsimile

October 14, 2011

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

The inability to hold the conference on 10/19, combined with defense counsel's schedule and my own schedule make it impossible to schedule anything before 11/16. I have, however, set aside two hours that

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

Dear Judge Maas, USDC, 10/14/11

The Plaintiffs' Executive Committees, and the Defendants' Executive Committees, on behalf of the Defendants who are currently subject to discovery ("Defendants"), respectfully submit their proposals with respect to the status conference scheduled for October 19, 2011:

Plaintiffs' Proposal

Due to an unanticipated scheduling conflict, the Plaintiffs' Executive Committees respectfully request that the Court adjourn the October 19, 2011 discovery conference to another date. At the same time, Plaintiffs believe that a number of issues may warrant the Court's attention prior to the next scheduled conference on November 16, 2011, and therefore believe it would be beneficial to set a date for an additional conference in the interim.¹

¹ Earlier this week, Plaintiffs approached Defendants in an effort to identify a mutually agreeable date for an interim conference, and advised that any date between October 31, 2011 and November 4, 2011 would be acceptable to Plaintiffs. In response, Defendants advised the counsel for the Muslim World League, International Islamic Relief Organization, and the World Assembly of Muslim Youth would not be available during that week, and proposed that the parties simply wait until November 16, 2011 to address any issues.