



MEMO ENDORSED

A PROFESSIONAL CORPORATION

1900 MARKET STREET PHILADELPHIA, PA 19103-3508 215.665.2000 800.523.2900 215.665.2013 FAX www.cozen.com

Sean P. Carter
Direct Phone 215.665.2105
Direct Fax 215.701.2105
scarter@cozen.com

December 29, 2010

VIA FEDERAL EXPRESS

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

APPLICATION GRANTED
SO ORDERED

Handwritten signature of Frank Maas
Frank Maas, USMJ 12/30/10

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

Dear Judge Maas:

I write on behalf of the plaintiffs to request that the existing deadline for responding to written discovery requests be extended by two weeks, from January 7, 2011 to January 21, 2011.

As Your Honor is aware, the existing Scheduling Order required the parties to serve written discovery requests on or before December 10, 2010. On that date, four of the defendants served 14 separate sets of written discovery requests on plaintiffs. Due to the varying holiday and vacation schedules of the members of the Plaintiffs' Executive Committees, plaintiffs have had limited ability to coordinate their efforts to prepare responses to those discovery requests over the last few weeks, an impediment that has effectively truncated the already aggressive schedule for responding to written discovery. As a result, plaintiffs respectfully request a two week extension of the deadline for all parties to respond to written discovery requests, to allow plaintiffs sufficient time to coordinate their responses.

1 Other of the defendants served their written discovery earlier in the litigation.

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On December 20, 2010, plaintiffs wrote to the defendants to request their consent to this proposed extension. On December 23, 2010, the defendants responded by email, requesting that the following statement be included in this submission on their behalf:

Defendants do not oppose plaintiffs' request for an extension of time for serving responses to discovery, provided that plaintiffs provide their Amended Initial Disclosures by December 31, 2010.

With regard to the defendants' statement, plaintiffs note that they will be serving their Amended Initial Disclosures on December 31, 2010.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

BY:  SEAN P. CARTER

SPC/bdw

cc: Jodi Flowers, Esquire
James Kreindler, Esquire
Robert Haefele, Esquire
Andrew Maloney, Esquire
Jerry Goldman, Esquire
Alan Kabat, Esquire
Stephen A. Cozen, Esquire
Scott R. Tarbutton, Esquire
Adam Bonin, Esquire