



OMAR T. MOHAMMEDI, LLC

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/28/11
OMAR T. MOHAMMEDI, LLC

DEC 28 2011

233 BROADWAY, SUITE 801
WOOLWORTH BUILDING
NEW YORK, NY 10279
PHONE (212) 725-3846
FACSIMILE (212) 202-7621
WWW.OTMLAW.COM

OMAR T. MOHAMMEDI, ESQ.
PHONE: (212) 725-3846
EMAIL: OMOHAMMEDI@OTMLAW.COM

ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT, ALGERIAN BAR
US COURT ON INTERNATIONAL TRADE

MEMO ENCLOSED

December 28, 2011

VIA HAND DELIVERY

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

The January 13th conference was set up to follow Judge Daniels' conference earlier the same day and obviously involves numerous parties. I therefore am unwilling to move or simply to address these discrete issues. We can address the issues at the February 15 conference

Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Judge Maas:

and make any necessary adjustment in the discovery schedule for WAMY or their time

We represent Defendants World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International (collectively "WAMY") in the above captioned matter. We respectfully request that this Court postpone the hearing on January 13, 2012. In the alternative, we respectfully request that this Court hold an additional discovery hearing in the third week of January.

Follows,
USMJ
12/28/11


Defendant WAMY has tried in earnest and in good faith to meet and confer with the Plaintiffs over numerous discovery issues with Plaintiffs' responses to WAMY's document requests. In order to resolve issues related to WAMY's First and Second Set of Document Requests, WAMY sent numerous letter and email correspondence before the April 12, 2011 discovery hearing. Since then, WAMY has conferred with Plaintiffs via letter on September 29, via telephone on October 18, via letter on November 16, via letter on December 19 and via email on December 22.

WAMY also attempted to meet and confer on its Third Set of Document Requests to Plaintiffs via letter dated December 19 and via email on December 22. WAMY's latest correspondence to Plaintiffs requested to meet and confer before December 23, 2011. Plaintiffs have not responded to any of WAMY's correspondence since November 16, 2011. WAMY fully intended to submit a letter brief motion to compel in the event the parties remained at a stalemate. Due to the holiday schedule and Plaintiffs' lack of response to WAMY's December 19 letter, it was not possible for the parties to fully brief a motion to compel in accordance with Your Honor's briefing schedule in advance of the January 13, 2012 discovery hearing.

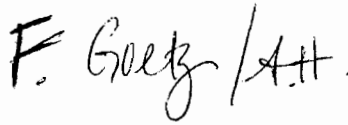
MEMO ENCLOSED

As a result, WAMY respectfully requests that this Court postpone the January 13, 2012 hearing to the week of January 26, 2012 before the close of discovery on January 31. Alternatively, WAMY respectfully requests that this Court schedule an additional discovery hearing during the week of January 26, 2012 so that WAMY may file and be heard on its motion to compel before the end of discovery.

Respectfully submitted,



Omar Mohammedi, Esq.



Frederick Goetz, Esq.

cc: All MDL Counsel (via email)