

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 1/11/12

MEMO ENDORSED

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

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

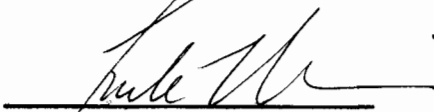
Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN 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

January 11, 2012

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

  
Frank Maas, USMJ  
1/11/12

Re: *In Re: September 11, 2001 World Trade Center Attack*, 03 MDL 1570 (GBD)

Dear Judge Maas:

The Plaintiffs' Executive Committees and the Defendants' Executive Committee, on behalf of the defendants currently subject to discovery, respectfully and jointly propose that, under the circumstances, the conference scheduled for January 13, 2012, be rescheduled until February 15, 2012.

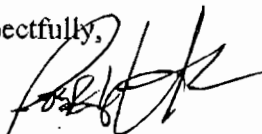
Having further conferred after exchanging the recent agenda letter, the parties believe that additional time would benefit all participants' interests. In the recent joint agenda letter, the parties identified no disputes presently ripe for Your Honor's consideration. The only issue identified was plaintiffs' request to discuss a modification of the discovery schedule and a framework for motion practice and follow up discovery after completion of the rolling productions. Defendants responded that, though they did not object, they could not comment because they did not know what plaintiffs had in mind. After further consultation with defendants, the parties agree that it would be more productive to adjourn the upcoming conference to afford the parties time to discuss the referenced proposals and see if we can reach agreement.

The Honorable Frank Maas, U.S.M.J.  
January 11, 2012  
Page 2

---

Accordingly, the parties propose that the January 13, 2012 conference be adjourned until February 15, 2012, and in the interim the parties will confer and present proposals to the Court by Friday, February 3, 2012, for the next scheduled conference on February 15, 2012.

Respectfully,



Robert T. Haefele  
THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

Alan R. Kabat 

Alan R. Kabat  
THE DEFENDANTS' EXECUTIVE  
COMMITTEE

cc: Hon. George B. Daniels (By Facsimile)  
MDL-1570 counsel (By electronic mail)