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MEMO EPIDORAT

## 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 lld	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, Co-Liaison Counsel KRUINDLER & KRUINDLER LLP Paul J. Hanly, Jr., Co-Liaison Counsel HANLY CONROY BIERSTEIN SHERIDAN PISHER & HAYES LLP	J. Scott Tarbutton, Liaison Counsel COZEN O'CONNOR

VIA FACSIMILE

June 1, 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

De cutreme is ados med to 7/17 et 2:30 pm in Controom 200. The downent production devolue is adjourned (afair In Re: September 11, 2001 World Trade Center Attack, 03 MDL 1570 (GBD) 6 8 20/12,

Council should not anherpate

Dear Judge Maas:

Forter adportments. Fular, usur, The Plaintiffs' Executive Committees and the Defendants' Executive Committee, on behalf of the Defendants who are currently subject to discovery, submit this joint letter regarding the discovery status conference scheduled for June 6, 2012. The parties are in agreement that there are no discovery issues ripe for review, and request that the June 6 status conference be adjourned. However, because no other conferences are presently scheduled, the parties jointly request that Your Honor set the next conference for July 17, 2012, either at 2:30 pm or following the conference that is presently scheduled in this matter before Judge Daniels. (At the conclusion of the March 13, 2012 conference, Judge Daniels set the next conference for July 17, 2012 at 11 am. See Transcript of 3/15/12 Conference at page 58, lines 22-24.)

In addition, the defendants request that Your Honor extend the current document production deadline for all parties subject to discovery, presently set for June 29, 2012, to August 30, 2012. Plaintiffs have advised that they consent to this request.

The Honorable Frank Maas, U.S.M.J. June 1, 2012 Page 2

Respectful

Robert T. Haefele

THE MDL 1570 PLAINTIFFS' EXECUTIVE

**COMMITTEES** 

Alan R. Kabat

THE DEFENDANTS' EXECUTIVE

COMMITTEE

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