

BERNABEI & WACHTEL, PLLC

ATTORNEYS AT LAW
1775 T STREET, N.W.
WASHINGTON, D.C. 20009

LYNNE BERNABEI
DAVID WACHTEL
ALAN R. KABAT

202.745.1942
FAX: 202.745.2627
WWW.BERNABEIPLLCC.COM

PETER M. WHELAN
ELIZA BRINK DERMODY
LAUREN R. S. MENDONSA A
NADIA E. SAID ■

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■ ADMITTED IN IL ONLY

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January 3, 2013

MEMO ENDORSED

Hon. Frank Maas
United States Magistrate Judge
Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

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

Dear Judge Maas:

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 several discovery deadlines.

First, the parties jointly request that the deadline set in the Order (ECF 2644) (Nov. 19, 2012) for producing the privilege logs be extended by thirty (30) days, to Friday, February 1, 2013. This request was initiated by counsel for the Muslim World League and the International Islamic Relief Organization, as those clients are in the process of obtaining new counsel, and counsel have been unable to finalize the privilege log during this transition. Counsel for the remaining defendants, and counsel for plaintiffs concur in this request.

① Approved

Second, the plaintiffs have requested, and some defendants concur, that the motions deadlines established in this Court's Amended Order (ECF 2627) (Oct. 25, 2012) also be adjusted by 30 days, as set forth below:

Any motions to compel shall be submitted on a rolling basis, with an absolute deadline of May 20, 2013. Opposition papers shall be filed three weeks after each such motion, with an absolute deadline of June 10, 2013. Any replies shall be filed within one week of opposition papers, with an absolute deadline of June 17, 2013.

② Approved

③ The 1/15/13 conference is canceled. A conference will be held 2/21/13 at 11 a.m. in Courtroom 20A. Mas, USMS, 1/4/13

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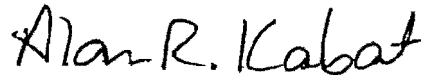
Finally, because the parties agree that no disputes will be ripe for Your Honor's consideration on January 15, 2013, the parties jointly propose that the conference for that date be adjourned. Because the plaintiffs anticipate one or more disputes being ripe for consideration by mid-to-late February, we propose that a conference date be set during that time period.

Thank you for your consideration of these requests.

Respectfully submitted,



Robert Haefele
Plaintiffs' Executive Committees



Alan R. Kabat
Defendants' Executive Committee

cc: Judge George B. Daniels
All MDL-1570 counsel of record (via email)