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The Honorable Frank Maas United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, Room 740 New York, NY 10007-1312 By Telecopier September 18, 2013

All requests contained in-this letter are granted. So Ordered.

MEMO ENDORSED

have Waas U.S.M.J

Re: Terrorist Attacks on September 11, 2001, No. 03 MDL 1570 (GBD)(FM)

9/19/13

Dear Judge Maas:

The Plaintiffs' Executive Committees and the Defendants' Executive Committee (on behalf of the Defendants currently in discovery in this Court and those defendants remanded by the Court of Appeals for judicially-supervised jurisdictional discovery) respectfully submit this letter application with respect to the upcoming discovery deadlines.

First, on August 22, 2013, the parties served their jurisdictional discovery requests. The objections and responses are currently due on September 26, 2013. Due to the scope of these discovery requests, several of the remanded defendants request Your Honor's extending the deadline to submit the objections and responses by four weeks, up to and including October 21, 2013. This request is made pursuant to Rule 6(b)(1)(A), Fed. R. Civ. P., and will apply to the jurisdictional discovery served on both plaintiffs and the following remanded defendants; Soliman H.S. Al-Buthe, Abdullah Omar Naseef, Abdullah Bin Saleh Al Obaid, Abdullah Muhsen Al Turki, Adnan Basha, Abdul Rahman Al Swailem, and Yassin Abdullah Kadi.

Second, Your Honor previously granted the request of Yassin Kadi that he be allowed additional time to propound his jurisdictional discovery requests to plaintiffs. In light of the foregoing request for extension of time, counsel for Mr. Kadi requests an extension of time of

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one additional week to propound his discovery requests, from September 23, 2013 to September 30, 2013. Counsel for plaintiffs consent to this request.

Third, the parties have discussed whether a further extension of the January 15, 2014 deadline for completing written discovery is necessary. Counsel for both the merits defendants and the remanded defendants do not believe that any further extension is necessary. Counsel for plaintiffs believe that the extension of the deadline for providing discovery responses will likely necessitate a corresponding extension of the January 15, 2014 deadline for completing document discovery. However, plaintiffs will reserve making a formal request for the time being.

We appreciate your consideration of these requests.

Respectfully,

R.T. Haefele/AK

Robert T. Haefele The MDL-1570 Plaintiffs' Executive Committees

Nian R. Kabat

Alan R. Kabat The Defendants' Executive Committee

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