



U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
11/26/13

Sean P. Carter
Direct Phone 215-665-2195
Direct Fax 215-701-2100
scarter1@cozen.com

MEMO ENDORSED

November 25, 2013

VIA FACSIMILE

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

*The schedule set forth below
is adopted.*

*Maas, USDC,
11/26/13*

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

Dear Judge Maas:

On October 28, 2013 Your Honor issued a Memorandum Decision and Report and Recommendation concerning plaintiffs' sanctions motions against defendants Wa'el Hamza Jelaidan, Al Haramain Islamic Foundation (USA), Al Haramain Islamic Foundation (Saudi Arabia) and Rabita Trust. ECF No. 2789. Through that decision, Your Honor set a thirty (30) day deadline for plaintiffs to submit affidavits and other relevant documents in support of the fee and cost awards recommended against defendants Jelaidan and Al Haramain Islamic Foundation (USA).

At the discovery conference held on October 29, 2013, plaintiffs advised the Court that they may need additional time to compile their relevant records for all the time and costs incurred in bringing those motions, and to coordinate the format of the submissions among the various members of the Plaintiffs' Executive Committees. In response, Your Honor indicated "if you want to extend that, and you work it out, I have no problem with that." See October 29, 2013 Hearing Transcript, at p. 4.

Based on discussions among the members of the Plaintiffs' Executive Committees concerning the efforts necessary to compile and coordinate the relevant records, and after conferring with counsel for defendants Jelaidan and Al Haramain Islamic Foundation (USA), plaintiffs respectfully request that the briefing schedule for the fee and cost applications be amended as follows:

Deadline for Plaintiffs' fee application: January 10, 2014

The Honorable Frank Maas
November 25, 2013
Page 2

Deadline for Defendants' oppositions: February 14, 2014

Deadline for Plaintiffs' Reply: February 24, 2014

Defendants Jelaidan and Al Haramain Islamic Foundation (USA) consent to this request.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully,

COZEN O'CONNOR



BY: SEAN P. CARTER

SPC/bdw

cc: The Honorable George B. Daniels, U.S.D.J. (Via Facsimile)
Members of Plaintiffs' Executive Committees (Via Email)
Members of Defendants' Executive Committee (Via Email)