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

Via Facsimile (212-805-6724)

January 9, 2014

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

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

Dear Judge Maas:

Under the current schedule, the PECs' fee petitions related to Your Honor's order imposing sanctions (ECF No. 2789) is due on January 10, 2014. Plaintiffs request that the deadline be adjourned two weeks to January 24, 2014, one week after the currently scheduled hearing before Judge Daniels on January 16, 2014. Plaintiffs need the additional time to finalize their application and various travel commitments next week will prevent full attention to the finalization until thereafter. Moreover, the defendants have asked that Judge Daniels address their objections at the conference on January 16 and the extension would allow Plaintiffs to address any relevant rulings that Judge Daniels may issue at that time as part of the fee petitions, and thereby promote efficiency.

We reached out yesterday to Mr. Kabat, as liaison counsel for the DEC and counsel for Al Haramain, one of the two sanctioned parties addressed in the fee petition. Mr. Kabat advised us today that Al Haramain takes no position on the request. We also spoke to Mr. McMahon, counsel for Wa'el Jelaidan, the other sanctioned defendant reference in the fee petition, and he has consented.

Respectfully,

Approved.

The Honorable Frank Maas January 9, 2014 Page 2

Robert T. Haefele, Esq.
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29466
Tel: (843) 216-9000
Fax: (843) 216-9450
rhaefele@motleyrice.com

THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

cc: Hon. George B. Daniels (via first class mail)
Alan Kabat, Esq. – via electronic mail
Martin McMahon, Esq. – via electronic mail