

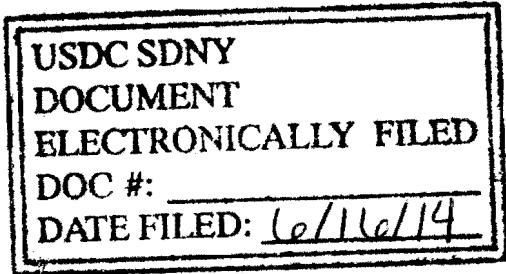
BERNABEI & WACHTEL, PLLC

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.BERNABEIPLLC.COM

PETER M. WHELAN
LAUREN R. S. MENDONSA
NADIA E. SAID
MATTHEW E. RADLER▲
KAREN TANENBAUM
▲ ADMITTED IN VA ONLY



By Telecopier
June 12, 2014

**APPLICATION GRANTED
SO ORDERED**

Frank Maas
Frank Maas, USMJ 6/16/14

Honorable Frank Maas
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 740
New York, NY 10007-1312

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

Dear Judge Maas:

I write on behalf of those Defendants who have not yet completed document production (the "Requesting Defendants"), to ask that the Court extend the current document production deadline from June 30, 2014 to September 30, 2014.¹ Counsel for Plaintiffs have consented to the requested relief. We have also conferred with the non-requesting co-defendants who state that they have completed their document productions and they do not oppose this request.

This request is necessitated by the enormous volume of documents these Requesting Defendants must review in order to respond to the broad requests that have been propounded. Our task is particularly time-consuming given the large percentage of Arabic, Bosnian, and other languages with which we are dealing. Additional resources have been added to some of the teams, but the task is still a daunting one.

Additionally, the month-long Ramadan observance will begin at the end of June and work in clients' offices cannot proceed at its normal pace during this time. Arabic-speaking members of legal teams are also affected by Ramadan.

¹ The Requesting Defendants include the following merits defendants: Muslim World League, International Islamic Relief Organization, WAMY-International, and WAMY-Saudi Arabia; and the following personal jurisdiction defendants: Yassin A. Kadi, Abdullah Al-Turki, Abdullah Al-Obaid, Abdullah Naseef, and Adnan Basha.

Hon. Frank Maas
June 12, 2014
Page 2 of 2

Although not every Requesting Defendant requires the full 90 days requested, the Requesting Defendants are making a unified request in deference to the position that plaintiffs have repeatedly articulated that the production schedule should be uniform.

Several of the defendants who have not yet completed discovery will shortly be making another substantial production and will continue to produce documents on a rolling basis, in order to provide Plaintiffs with a more workable review schedule than if those defendants waited longer to make productions.

Therefore, we respectfully request your Honor's endorsement of this request.

Sincerely,

/s/ Alan R. Kabat

Alan R. Kabat
Defendants' Executive Committee

cc: Hon. George B. Daniels
MDL-1570 Counsel of Record