



LAW FIRM OF  
OMAR T. MOHAMMEDI, LLC

233 BROADWAY, SUITE 801  
WOOLWORTH BUILDING  
NEW YORK, NY 10279  
PHONE (212) 725-3846  
FACSIMILE (212) 202-7621  
WWW.OTMLAW.COM

**RECEIVED**  
SEP 22 2014  
FRANK MAAS  
U.S. MAGISTRATE JUDGE

**MENTIONED**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 9/23/14

September 17, 2014

VIA ECF

Honorable Frank Maas  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

*The deadline for document  
production is extended to  
12/15/14 on consent.  
Filper, USMJ, 9/23/14*

**RE: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570**

Your Honor:

Counsel for the World Assembly of Muslim Youth and the World Assembly of Muslim Youth International (collectively, WAMY) write to respectfully request that this Court extend the current document production deadline from September 30, 2014 to December 15, 2014. Although this request is made on behalf of WAMY, it would apply to all parties. Plaintiffs have consented to the requested relief. Most of the other defendants consent to this request and the extended deadline. Dubai Islamic Bank takes no position on the request or the extended deadline. Dallah Avco does not oppose an extension to December 15, 2014.

Since this Court's April 24, 2014 Order requiring WAMY to produce documents in this country, WAMY has been producing its documents on a rolling basis. WAMY had attempted to complete this discovery by September 30, 2014, the deadline set for the completion of paper discovery, although the occurrence of Ramadan (this year, throughout the month of July 2014), has slowed the process. Thus far, WAMY has produced approximately 55,000 pages, but will be unable to complete its production by September 30, given the large volume of other documents that WAMY must review and copy in order to respond to the broad requests that have been propounded. WAMY's task

is particularly time-consuming given the large percentage of the documents and materials that are in Arabic and languages other than English.

I respectfully request your Honor's endorsement of this request.

Respectfully Submitted,

*/s/ Omar Mohammedi*

Omar T. Mohammedi, Esq.

*/s/ Frederick Goetz*

Frederick Goetz, Esq.

Cc: All Plaintiffs and Defendants (via ECF)