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February 28, 2016

NML Capital, Ltd. v. Republic of Argentina, No. 08 Civ. 6978 (TPG);
Seijas v. Republic of Argentina, No. 04 Civ. 400 (TPG); and related cases

Dear Judge Griesa:

We represent the Republic of Argentina (the "Republic") in the above-referenced cases. The Republic respectfully requests an extension of time of thirty (30) days, from March 2, 2016, to April 1, 2016, to respond to the Class Plaintiffs' Motions to Amend and for Preliminary Injunction.¹ The Republic also requests an extension of time of thirty (30) days, from March 4, 2016, until April 4, 2016, to respond to the Class Plaintiffs' motion to intervene in *NML Capital, Ltd. v. Republic of Argentina*, No. 08 Civ. 6978 (TPG) (Dkt. 883).

The Republic requests these extensions of time because the parties are engaged in supplemental briefing of the Republic's motion to vacate (No. 08 Civ. 6978 (TPG), Dkt. 861) and preparation for the hearing to take place on March 1, 2016, as well as anticipated proceedings in the Court of Appeals. The outcome of the Republic's motion may make the Class Plaintiffs' motions moot. As the Court is aware, the parties are also actively engaged in settlement discussions.

¹ The moving Class Plaintiffs are the plaintiffs in Case Nos. 04 Civ. 400 (TPG), 04 Civ. 401 (TPG), 04 Civ. 506 (TPG), 04 Civ. 936 (TPG), 04 Civ. 937 (TPG), 04 Civ. 1085 (TPG), 04 Civ. 2117 (TPG), and 04 Civ. 2118 (TPG). The motions are found at 04 Civ. 400 (TPG) Dkt. 286, 04 Civ. 401 (TPG) Dkt. 185, 04 Civ. 506 (TPG) Dkt. 182, 04 Civ. 936 (TPG) Dkt. 184, 04 Civ. 937 (TPG) Dkt. 182, 04 Civ. 1085 (TPG) Dkt. 182, 04 Civ. 2117 (TPG) Dkt. 181, and 04 Civ. 2118 (TPG) Dkt. 172.

This is the Republic's first request for an extension on these motions. The Class Plaintiffs declined the Republic's request for consent to these extensions.

Sincerely,

/s/ Michael A. Paskin

Michael A. Paskin

Hon. Thomas P. Griesa
Daniel Patrick Moynihan
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BY HAND AND ECF

Copies to all counsel by ECF