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May 21, 2009

**VIA ELECTRONIC FILING AND  
 FIRST CLASS MAIL**

The Honorable Stanley R. Chesler, U.S.D.J.  
 King Fed. Bldg. & U.S. Courthouse  
 50 Walnut Street, P.O. Box 999  
 Newark, New Jersey 07101-0999

**Re: The Lautenberg Foundation, et al. v. Madoff  
 Civil Action No. 2:09-cv-00816 (SRC-MAS)**

Dear Judge Chesler:

Our firm, along with our co-counsel, Lankler Siffert & Wohl LLP, represent defendant Peter Madoff in the above-referenced matter. Pursuant to the instructions I received from Your Honor's law clerk, Jonathan Luick, please accept this letter as defendant's request for: (1) a one-week extension of time to file his reply brief; and (2) permission to file an overlength reply brief. Counsel for plaintiffs, Ronald J. Riccio, Esq., has consented to these requests.

As the Court is aware, defendant filed a motion to dismiss the complaint on May 4, 2009. Plaintiffs obtained the Court's permission (and our consent) to submit an overlength brief in opposition to defendant's motion to dismiss, which was filed by plaintiffs on May 18, 2009. Defendant's reply brief relative to the motion is due to be filed on May 26, 2009.

Defendant respectfully requests until Tuesday, June 2, 2009, in which to file an overlength reply brief. While we are still analyzing the arguments raised in plaintiffs' opposition brief, we do not anticipate that our reply brief will exceed twenty-five (25) pages in length.

The Honorable Stanley R. Chesler, U.S.D.J.

May 21, 2009

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We thank the Court for its consideration of our requests and for its attention to this matter.

Respectfully submitted,

*/s/ Michael J. Grohs*

Michael J. Grohs

GRO/bmc

cc: Honorable Michael A. Shipp, U.S.M.J. [via electronic filing and First Class Mail]  
Ronald J. Riccio, Esq. [via electronic filing]  
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Louis A. Modugno, Esq. [via electronic filing]  
Michael R. Griffinger, Esq. [via First Class Mail]  
Charles T. Spada, Esq. [via electronic filing]

SO ORDERED:

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HONORABLE STANLEY R. CHESLER  
UNITED STATES DISTRICT JUDGE