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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.

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The Honorable Stanley R. Chesler, U.S.D.J. ATTORNEYS AT LAW

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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]
Greg Trif, Esq. [via electronic filing]
Louis A. Modugno, Esq. [via electronic filing]
Michael R. Griffinger, Esq. [via First Class Mail]
Charles T. Spada, Esq. [via electronic filing]

SO ORDERED:



HONORABLE STANLEY R. CHESLER
UNITED STATES DISTRICT JUDGE