



**William F. Maderer**  
973.645.4814  
[wmaderer@saiber.com](mailto:wmaderer@saiber.com)

April 21, 2010

**VIA ELECTRONIC FILING AND**  
**FIRST CLASS MAIL**

The Honorable Stanley R. Chesler, U.S.D.J.  
United States District Court  
for the District of New Jersey  
Frank R. Lautenberg United States Post Office  
& Courthouse Building  
Room 417, 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-MCA)**

Dear Judge Chesler:

We, along with Lankler Siffert & Wohl LLP, represent defendant Peter Madoff in the above-captioned action. As Your Honor is aware, on March 12, 2010, Plaintiffs filed a motion for summary judgment (the "Rule 56 Motion"). Defendant plans to file his opposition to the Rule 56 Motion and cross-move for this action to be stayed (the "Stay Motion") on Monday, April 26, 2010.

Under Local Civil Rule 7.2(d), briefs are limited to 30 pages in 12-point proportional font. As a result, Defendant understands that he would be entitled to file by April 26 a 30-page brief in opposition to the Rule 56 Motion and a 30-page brief in support of his motion for a stay, for a total of 60 pages. Given the overlapping facts and principles involved in the two motions, Defendant believes it would be more efficient and convenient for the parties and the Court if Defendant addresses the two motions together in one consolidated brief rather than in separate redundant briefs.

The Honorable Stanley R. Chesler, U.S.D.J.  
April 21, 2010  
Page 2

Accordingly, Defendant intends to file one brief in opposition to the Rule 56 Motion and in support of the cross-motion for a stay. Defendant respectfully requests permission to combine the page limits for two briefs (30 pages each) and file one brief not to exceed 60 pages, in opposition to the Rule 56 Motion and in support of the cross-motion for a stay.

We have consulted with Plaintiffs' counsel, who has informed us that Plaintiffs do not object to our request.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,


*/s/ William F. Maderer*

William F. Maderer

WFM

cc: Honorable Madeline Cox Arleo, U.S.M.J. [via electronic filing and First Class Mail]  
Ronald J. Riccio, Esq. [via electronic filing]  
Michael R. Griffinger, Esq. [via electronic filing]  
Charles T. Spada, Esq. [via electronic filing]

SO ORDERED:



HONORABLE STANLEY R. CHESLER  
UNITED STATES DISTRICT JUDGE