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April 16, 2014

BY HAND DELIVERY AND ELECTRONIC MAIL

The Honorable Shira A. Scheindlin United States District Judge Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, Room 1620 New York, New York 10007-1312 USDC SDNY
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The parties' request for an extension is hereby GRANTED. The CMO 4 and CMO 10 discovery deadline is now June 30, 2014.

April 18,2014

O ORDERED;

Shira A. Scheindlin

U.S. D. J.

Dear Judge Scheindlin:

Re:

I write on behalf of Defendants and Plaintiffs in the four MTBE cases filed last year. 1

Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358

The parties are actively engaged in settlement talks, with much progress being made. But both sides also face a May 15 deadline to provide CMO 4 and CMO 10 discovery – productions that would require very significant resources over the next month. I have conferred with Mr. Gordon, Mr. Summy and Ms. Greenwald, and we are all agreed that both sides would prefer to devote their resources to continued settlement efforts. Accordingly, both sides respectfully request a 45-day extension of the May 15 deadline for the CMO 4 and CMO 10 discovery.

As always, we appreciate your time and attention to this matter.

Respectfully submitted,

James N. Pardo

James A. Pardo

cc: All Counsel of Record by LNFS, Service on Plaintiffs' Liaison Counsel

¹ Town of Brewster, et al. v. Atlantic Richfield Co., et al., No. 13-cv-07247; Town of Hinesburg v. Atlantic Richfield Co., et al., No. 13-cv-07271; City of Manning v. Ashland Inc., et al., No. 13-cv-07272; and City of Portageville v. Ashland, Inc., et al., No. 13-cv-07299.