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October 19, 2015

**VIA EMAIL AND FEDERAL EXPRESS**


The Honorable Shira A. Scheindlin  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, New York 10007

Re: *In re Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation  
Commonwealth of Pennsylvania v. Exxon Mobil Corp., et al.*  
MDL No. 1358; Case No. 1:14-cv-06228-SAS  
**Extension of Time to File Second Amended Complaint**

Dear Judge Scheindlin:

The Commonwealth respectfully requests a brief extension of the time to file its Second Amended Complaint in the above case, from October 23, 2015, to November 6, 2015, with defendants' time to move or answer extended to December 7, 2015. Defendants do not oppose this extension and the parties have jointly prepared a proposed order granting the extension (attached). The extension is requested to allow the Commonwealth sufficient time to review the voluminous information it has received in response to its initial set of interrogatories and requests for production, as well as in response to certain deadlines established in recently entered CMO 119. As always, we appreciate the Court's consideration of this request.

Sincerely,

  
Michael Axline  
Counsel for Plaintiff

MA/kh

Encl.

cc: All Counsel via File & ServeXpress and Email

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE METHYL TERTIARY BUTYL ETHER  
("MTBE") PRODUCTS LIABILITY  
LITIGATION

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

This document relates to:

*Commonwealth of Pennsylvania, et al. v. Exxon  
Mobil Corporation, et al.,*  
Case No. 1:14-cv-06228 SAS

**[JOINT PROPOSED] ORDER**

Plaintiff's deadline to file its Second Amended Complaint in the above case is hereby extended from October 23, 2015, to November 6, 2015. Defendants' time to move or answer is extended to December 7, 2015.

SO ORDERED

DATED: New York, New York  
\_\_\_\_\_, 2015

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Shira A. Scheindlin, U.S.D.J.