

# Akin Gump

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February 20, 2019

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: MDL 1358 / MTBE, *New Jersey Department of Environmental Protection, et al.*  
*v. Atlantic Richfield Co., et al.*, No. 1:08-cv-00312-VSB

Dear Judge Broderick,

As you know, we represent newly-added defendants Lukoil North America, LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (the "newly-added Lukoil Defendants"), which entities were added as Defendants in the above-referenced litigation by the Court's Order of September 28, 2018, granting leave to file a Fifth Amended Complaint.

The newly-added Lukoil Defendants respectfully request an extension of time through March 25, 2019, in which to answer, move or otherwise respond to the Fifth Amended Complaint. Existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., represented by Matthew G. Parisi of Bleakley Platt & Schmidt, LLP, join in this request for an extension.

We have conferred with counsel for Plaintiff, and they have no objection to this extension.

The Parties have signed the enclosed stipulation, and we respectfully request your signature on the enclosed "Stipulation and [Proposed] Order."

Sincerely,



Katherine M. Katchen

Enclosure

cc: All counsel of Record (via LNFS)