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DEF. PRO SE: _____
DATE: 6/28/07
BY: MM

VIA FAX

June 28, 2007

*June 28, 2007
Application Granted
Michael Kelley
6/28/07*

Hon. Barbara S. Jones
United States Courthouse
500 Pearl Street, Room 620
New York, NY 10007

Re: Valerie Plame Wilson; Simon & Schuster, Inc. v. J. Michael McConnell Director of National Intelligence; Central Intelligence Agency, et al., No. 07 CV 4595 (BSJ)

Dear Judge Jones:

My firm represents plaintiff Valerie Plame Wilson, and also represents, together with Elizabeth McNamara and her firm Davis Wright Tremaine LLP, plaintiff Simon & Schuster, Inc. in the above-referenced action.

In accordance with the Scheduling Conference held by the Court on June 12, 2007, we inform the Court of a further minor delay arising from discussions regarding sealing issues and defendant CIA's preparation of a certified administrative record. Last evening, plaintiffs and defendants reached agreement on a stipulation and protective order regarding sealing issues and other issues concerning defendants' administrative record submission. I understand that the proposed stipulation and protective order will be submitted this afternoon for approval by the Court. In order to meet the requirements for filing documents under seal, and in order to properly reference the administrative record in plaintiffs' papers, plaintiffs are requesting an additional twelve hours to file their opening brief with the Court, on or before 12 noon Friday, June 29, 2007. This request follows an initial request by the parties to extend the original scheduling order by forty-eight hours, which request was previously granted by the Court. Defendants have consented to plaintiffs' request as set forth herein. No other filing dates would be affected, and a courtesy copy of plaintiffs' papers would be delivered by hand to the Court on the proposed date of filing.

Wilson et al v McConnell et al

Doc. 14

Respectfully Yours,

David B. Smallman
David B. Smallman

cc: All Counsel (Via Fax and Email)

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