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JUN 24 2011
DENISE COTE

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June 23, 2011

BY HAND

Hon. Denise Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: Safflane Holdings Ltd. et. al. v. Gagosian Gallery,
Inc., 11-cv-01679-DLC ("Safflane action")
-and-
The Metropolitan Museum of Art, et. al. v. Safflane
Holdings, Ltd., et. al., 11-cv-3143-DLC ("Met action")

Dear Judge Cote:

This letter is written pursuant to Rule 1.E. of the rules of this Court to request an extension of the July 15, 2011 deadline to join new parties or amend pleadings as set forth in the May 16, 2011 Pretrial Scheduling Order. No prior extension of the July 15, 2011 deadline has previously been requested.

On June 16, 2011, this Court adjourned the June 20, 2011 deposition of non-party witness Charles Cowles. Counsel have agreed that the deposition of Mr. Cowles will be on July 13, 2011, approximately three weeks from Mr. Cowles subpoenaed date. Mr. Cowles deposition is only two days from the July 15, 2011, deadline. Hopefully Mr. Cowles will appear. Plaintiffs Safflane and Wylde have noticed depositions in both cases for late July and early August and responses to document discovery are due on July 22, 2011. I expect that opposing counsel will seek to adjourn those dates and I predict that there will be conferences concerning document discovery as well. I currently plan to be away from July 27 to August 15.

In the event the deposition of Mr. Cowles or other depositions disclose information warranting the joinder of new

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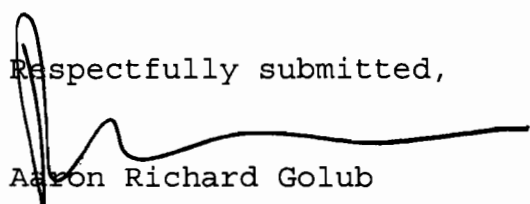
parties and/or the amendment of pleadings in the above actions, plaintiffs in the Safflane action will be prejudiced by not having sufficient time to join new parties and/or to amend their pleadings.

This office asked opposing counsel whether they would consent to the above extension, giving counsel until 10:00 A.M. on June 22, 2011 to object to the proposed extension (extended to 5:00 P.M. on June 22, 2011). Counsel for defendant Gagosian indicated that it did not object to the proposed extension. Counsel for the Metropolitan Museum of Art did not register an objection. Counsel for Jan Cowles objected to the proposed extension and indicated that he would agree to an extension to September 9, 2011. I suggested a compromise date of September 26, but we were unable to agree.

We would prefer the October 15 date due to the classic difficulty of scheduling depositions in the summer, although this office will attempt to take as many depositions as possible in late July, August and September, starting with the deposition of the Met on July 26.

This office respectfully requests that the July 15, 2011 deadline be extended to October 15, 2011 to prevent any prejudice to any party herein and requests that the Court endorse this letter.

Respectfully submitted,


Aaron Richard Golub

arg/dl

cc: All opposition counsel via e-mail

*Denial. Any application beyond July 15 must be supported by good cause.
Denise Cote
June 27, 2011*