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March 24, 2020

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

SO ORDERED 3/30/20

Alison J. Nathan, U.S.D.J.

Re: Republic of *Turkey v. Christie's Inc. and Michael Steinhardt*, 17 Civ. 3086 (AJN)

Your Honor:

We are the attorneys for Plaintiff, Republic of Turkey (“Plaintiff” or “Republic”). We appreciate the Court’s prompt ruling on the parties’ joint request last week for extensions of the pre-trial submission deadlines and the adjournment sine die of the trial in this case. (Dkt #297). We are writing your Honor again, however, because much has changed since last week when we made the application for an adjournment and even since last Friday when your Honor granted the application, necessitating this further application for an extension of the pretrial deadlines.

On March 22, 2020, Herrick, Feinstein LLP, the attorneys for Plaintiff, in response to Governor Cuomo’s March 20, 2020 Executive Order (No. 202.8), closed its office, except to permit access to two staff personnel in the mailroom and IT staff only as needed. Partners, associates and other employees at the firm are no longer permitted access to the office. In addition, the transition from an office environment to everyone working remotely has caused connectivity problems and, in at least three cases, serious technical failures and delays. Our firm’s IT staff is simply overwhelmed. Accordingly, our ability to meet the so-ordered filing deadlines has been compromised.

On top of that, because of New York City’s recent and alarming developments concerning the spread of COVID-19, two of Plaintiff’s attorneys and their families have temporarily relocated outside of the City which adds to the complications.

In light of the foregoing intervening circumstances which are causing and may well continue to cause delays, we respectfully request a further adjournment of the April 3, 2020 deadlines for the submission of pretrial papers until April 24, 2020 (and similar extensions for the few later submissions). Our new proposed schedule is attached. We have considered in making this request that Passover and Easter will occur during this period. Most importantly, we believe that there will be no prejudice to any party because the trial is currently adjourned sine die. And the parties will still be in a position to suggest a new trial date on April 27, 2020, as your Honor directed in



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last week's order. Defendants' counsel has advised us that Defendants will take no position on Plaintiff's request for a 3-week extension.

Respectfully submitted,

/s/ Lawrence M. Kaye
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Attorneys for Plaintiff
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Enclosure

cc: All Counsel of Record (via ECF)

Plaintiff's request is hereby granted. The Court adopts Plaintiff's proposed revised schedule for the filing of pretrial materials. SO ORDERED.
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	Current Date	Proposed New Date
Joint Pretrial Report (Rule 6.A): <ul style="list-style-type: none"> • Statement regarding subject matter jurisdiction • Summary of claims and defenses to be tried • Statement as to number of trial days needed • Any stipulations or agreed statements of fact or law to which all parties consent • List of witnesses who will testify at trial and a brief summary of the substance of each witness' testimony • Designations of deposition testimony to be presented to the court and any counter-designations and objections to admissibility by any other party • Exhibit lists, including any objections to admissibility by the other party • A statement of the damages claimed and any other relief sought 	April 3, 2020	April 24, 2020
Motions in limine (Rule 6.B.)	April 3, 2020	April 24, 2020
Pretrial Memorandum of Law (Rule 6.C.) (optional)	April 3, 2020	April 24, 2020
Trial Exhibits (Rule 6.E.)	April 3, 2020	April 24, 2020
Proposed Findings of Fact and Conclusions of Law (Rule 6.F.i.)	April 3, 2020	April 24, 2020
Deposition Excerpts (Rule 6.F.ii.)	April 3, 2020	April 24, 2020
Direct Testimonies of Trial Witnesses (Rule 6.F.iii.)	April 3, 2020	April 24, 2020
Courtesy Copies (Rule 6.G)	As soon as practically possible after filing	As soon as practically possible after filing
List of Affiants to Cross-Examine (Rule 6.F.iii.)	April 8, 2020	April 29, 2020
Oppositions to motions in limine (Rule 6.B.)	April 22, 2020	May 8, 2020

Replies to motions in limine (Rule 6.B.)	May 1, 2020	May 18, 2020
Final pretrial conference	TBD	TBD
Trial Date	TBD	TBD