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June 22, 2022

BY ECF & E-mail

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 435
New York, NY 10007

MEMO ENDORSED

Re: *In re Invictus Global Management, LLC*, Case No. 22-mc-00130 (S.D.N.Y.)
Second Joint Request to Extend Discovery Deadlines

Dear Judge Carter:

Pursuant to this Court's Individual Rule 1(D), we are writing on behalf of Respondents Apollo Global Management, Inc., and Marc Rowan and, with its counsel's consent, Petitioner Invictus Global Management, LLC, to ask the Court for a second extension of time as set out below.

Petitioner filed this 28 U.S.C. § 1782 proceeding on May 6, 2022 (ECF No. 1). On May 9, before this matter was assigned to Your Honor, Judge Preska entered an *ex parte* order (ECF No. 11) authorizing discovery under that provision, directing Petitioner to serve that order on Respondents, and directing Respondents to comply with the subpoenas accompanying Petitioner's petition by June 8. Petitioner effected service on Apollo on May 13, and on Mr. Rowan (through counsel) on May 31.

On May 31, 2022, the parties met and conferred, and agreed to extend the time for Respondents to make a motion to quash Petitioner's subpoenas, if any, by June 24. Respondents filed their first joint letter requesting an extension for time to file a motion to quash Petitioner's subpoenas on June 3, 2022. (ECF No. 13.)

On June 6, 2022, Respondents filed an amended joint letter to clarify that the request to extend the deadline of any motion to quash, should one be necessary, was intended to apply to any party's motion to quash that has standing to so file, and not just Respondents' motion. (ECF No. 15.) The parties requested the Court endorse the following schedule: (i) any party shall have until June 24, 2022 to file a motion to quash; (ii) Petitioner shall have until July 15, 2022 to file its opposition; and (iii) any moving party shall have until July 29, 2022 to file a reply submission.

On June 17, 2022, the parties met and conferred to negotiate the parameters of Respondents' response to Petitioner's subpoenas, and agreed, in light of their ongoing efforts to reach agreement on the scope of discovery in this matter, to another extension of time for any party that has standing to file a motion to quash to file one. The parties thus request that the Court endorse the following amended schedule: (i) any party shall have until July 22, 2022 to file a motion to quash; (ii) Petitioner shall have until August 12, 2022 to file its opposition; and (iii) any moving party shall have until August 26, 2022 to file a reply submission. The parties have agreed to hold any deposition requests in abeyance pending their document discovery negotiations, without prejudice to the right of Petitioner to re-notice such depositions.

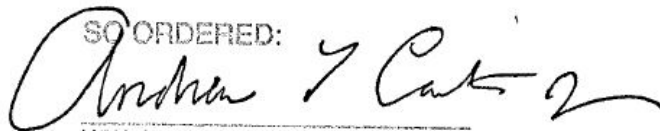
This letter constitutes the parties' second joint request for an extension to discovery deadlines. This proposed extension will not affect any other dates in this matter.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Andrew J. Ehrlich
Andrew J. Ehrlich

cc: All Counsel of Record (via ECF)

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
Dated: 6/22/2022