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DATE FILED: 10/1/13

September 30, 2013

**VIA FACSIMILE**

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007  
Fax: 212.805.7942

*The schedule is approved. Adjustments beyond that, on account of implications from the government's appropriations issue, will not be approved. Any necessary orders should now be prepared.* 9.30.13

Re: *In re September 11 Litigation*, 21 MC 101 (AKH)  
*Cantor Fitzgerald & Co, et al.*, 04 CV 7318 (AKH)

Dear Judge Hellerstein:

I write on behalf of plaintiffs Cantor Fitzgerald, *et al.* (collectively, "Cantor"), defendants American Airlines, Inc. and AMR Corporation (collectively, "American"), and the United States.

As noted in my enclosed letter of September 10, 2013, due to conflicting schedules of witnesses and counsel for the parties and the Government, liability expert depositions will not be completed until the end of this week. In addition, due to the requirement that the Government review the deposition transcripts of each liability expert for Sensitive Security Information ("SSI"), we do not expect to receive all of the liability expert deposition transcripts before October 11, 2013.

Accordingly, Cantor and American jointly request that the deadline for filing substantive and dispositive motions be extended until October 25, 2013 from the September 30, 2013 deadline set forth in the Joint Amended Case Management Plan and Order of May 22, 2013 ("CMO"). The requested extension will not delay the January 6, 2013 trial date.

In addition, and further to the Court's endorsement of my September 10th letter, Cantor and the United States submit the below revised proposed schedule for the briefing of disputed SSI trial designations and counter-designations in advance of the October 28, 2013 hearing before the Court on these issues. This schedule may require further revision in the event of a lapse in appropriations to the Department of Justice and the Transportation Security Administration.

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A DELAWARE LISTED LIABILITY PARTNERSHIP

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Page 2

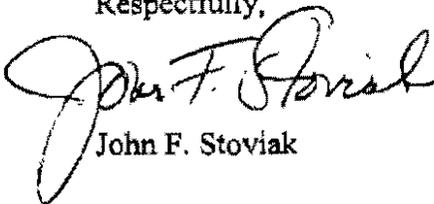
**October 17, 2013:** The Parties and TSA shall prepare and file under seal a schedule listing the SSI Designations and Counter-SSI Designations in dispute and objections thereto, accompanied by copies of the relevant documents or testimony, or portions thereof. At the same time, the Parties and TSA may also file briefing with regard to their respective objections.

**October 23, 2013:** Responsive briefing due.

American does not have any SSI trial designations or counter-designations in dispute.

Please do not hesitate to contact Mr. Barry, Ms. Normand or me should you have any questions.

Respectfully,



John F. Stoviak

Enclosure

Via E-Mail

cc: Desmond T. Barry, Esq.  
Roger E. Podesta, Esq.  
Victoria Turchetti, Esq.  
Evan Kwart, Esq.  
Jeannette Vargas, Esq.  
Sarah Normand, Esq.  
Wendy Reilly, Esq.  
Jennifer Beidel, Esq.