

## Michael D. Hausfeld Chair Emeritus

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Scott S. Harris, Clerk Supreme Court of the United States One First Street, NE Washington, DC 20543

## Re: *BNP Paribas SA, a French Corporation, et al. v. Entesar Osman Kashef, et al.*, No. 24-628

Dear Mr. Harris:

December 18, 2024

I represent respondents in the above-captioned case. The petition for a writ of certiorari was filed on December 5, 2024, and was placed on the Court's docket on December 9, 2024. Respondents' brief in opposition currently is due on January 8, 2025.

Pursuant to Supreme Court Rules 15.3 and 30.4, respondents respectfully request a thirty-day extension of time, to and including February 7, 2025, within which to file the brief in opposition. This extension is necessary because the attorneys with primary responsibility for preparing the brief in opposition have competing deadlines that will make it extremely difficult to complete the brief by the current due date.

In particular, the district court in this case (S.D.N.Y.) has scheduled extensive proceedings and deadlines over the next few weeks. The district court has ordered the effectuation of class notice to begin on January 17, 2025. Respondents are assisting the court-appointed notice administrator as it prepares to effectuate notice, including by assisting in the development of a detailed notice plan which must be submitted to the district court on December 18, 2024. The district court has also ordered the parties, with the assistance of the court-appointed special master, to submit by January 13, 2025, for the court's approval, an agreed-upon questionnaire to elicit relevant information as to damages suitable for incorporation in a database. The district court has further ordered the parties to identify a technical specialist who will be in charge of the creation of this database. Respondents' counsel are fully occupied in participating in these proceedings. A status conference on this and other matters is set with the district court on January 9, 2025.

In addition, Kathryn Lee Boyd, co-lead counsel for respondents, has a previously scheduled confidential JAMS arbitration commencing in West Palm Beach on January 6, 2025. This arbitration necessitates extensive preparation, including briefing and arguing pretrial motions, trial exhibit and witness preparation, and other matters.

Even absent the intervening holidays, these competing deadlines and proceedings would be an undue professional and personal hardship to complete the brief by the current due date.

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Thank you for your consideration of this request.

Sincerely,

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Michael D. Hausfeld