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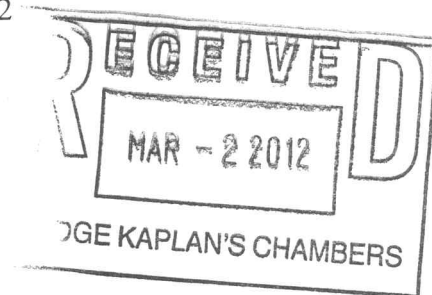
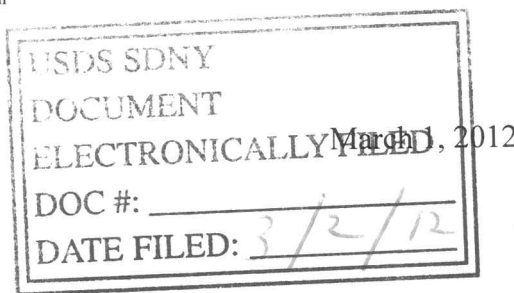
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BY HAND

Honorable Lewis A. Kaplan
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

09 MD 2017 & 09 CV 2363 (LAK)

Re: *American National Insurance Company et al. v. Richard S. Fuld Jr., et al.*, 09 Civ. 2363 (LAK)

Dear Judge Kaplan:

This firm represents the Bank Defendants in the above-captioned action. We write on behalf of both the Bank Defendants and Ernst & Young LLP ("EY"). The Banks Defendants' and EY's reply memoranda of law in support of their respective motions to dismiss are due March 5, 2012.

The Bank Defendants and EY write respectfully to request permission to file a joint reply memorandum of 15 pages. The Bank Defendants filed a 27-page opening brief. Dkt. No. 578 in 09 MD 2017 (LAK). EY joined in certain of the arguments made by the Bank Defendants in one paragraph. Dkt No. 624, at 1. Plaintiffs responded with a 30-page opposition to the Bank Defendants' brief (Dkt No. 716) and a 15-page opposition to EY's one-paragraph

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joinder (Dkt No. 707), effectively using 45 pages to respond to arguments raised only in the Bank Defendants' brief. Plaintiffs' also separately filed a three-page objection to certain exhibits in the Bank Defendants' supporting declaration. Dkt. No. 712. Thus, rather than submit three separate responses, the Bank Defendants and EY now propose to submit a single, 15-page joint reply that will address all three documents.

Thank you for your consideration of this request.

Respectfully submitted,

Victor Hou (BHG)

Victor L. Hou

cc: Counsel for all parties (by email)

SO ORDERED:

Aminah Cole

U.S.D.J.

3/2/12