

STEVEN S. ROSENTHAL Partner

901 New York Avenue NW 3rd Floor East Washington, DC 20001-4432 
 Direct
 202.618.5034

 Main
 202.618.5000

 Fax
 202.550.0508

 srosenthal@loeb.com

<u>Via Email</u>

March 15, 2018

The Honorable Pierre N. Leval Thurgood Marshall United States Courthouse 40 Foley Square, Room 1901 New York, New York 10007

Re: Delaware v. Arkansas, et al. No. 220145/220146 (Consolidated)

Dear Judge Leval:

The Parties have agreed to stipulate to a 90 day extension to complete discovery. Plaintiff State Delaware believes that, because the Parties are currently seeking additional discovery from third parties as a result of new information obtained from MoneyGram's document production, the agreed 90 day extension may need to be revisited in the future. The stipulated 90 day extension revises Section III. B. of the September 12, 2017 Case Management Order No. 2 as follows:

- 1. Discovery, including fact depositions and third party practice, completed by: June 25, 2018
- 2. Reports from Retained Experts Due: August 24, 2018
- 3. Expert Deposition Deadlines: October 23, 2018
- 4. Dispositive Motions Due: December 7, 2018
- 5. Tentative Trial Date: **Q2 2019**

Enclosed is an updated Case Management Order No. 3 reflecting the revised case schedule set forth above.



The Honorable Pierre N. Leval March 15, 2018 Page 2

Respectfully submitted,

Steven S. Rosenthal Tiffany R. Moseley J.D. Taliaferro LOEB & LOEB LLP 901 New York Avenue NW Washington, D.C. 20001 Ph: (202) 618-5000 Fax: (202) 618-5001 Eml: srosenthal@loeb.com tmoseley@loeb.com jtaliaferro@loeb.com

Marc S. Cohen LOEB & LOEB LLP 10100 Santa Monica Boulevard, Suite 2200 Los Angeles, CA 90067 Ph: (310) 282-2000 Fax: (310) 282-2200 Eml: mscohen@loeb.com

MATTHEW P. DENN Attorney General of Delaware AARON R. GOLDSTEIN State Solicitor Caroline Lee Cross Delaware Department of Justice Department of Finance Carvel State Office Building 820 North French Street Wilmington, DE 19801 Ph: (302) 577-8842 Eml: Caroline.Cross@state.de.us

Counsel for Delaware

Matthew H. Haverstick KLEINBARD LLC One Liberty Place, 46th Floor 1650 Market Street Philadelphia, PA 19103 Ph: (215) 568-2000 Fax: (215) 568-0140 Eml: mhaverstick@kleinbard.com

Counsel for Pennsylvania

Misha Tseytlin Solicitor General STATE OF WISCONSIN DEPARTMENT OF JUSTICE 17 West Main Street Madison, WI 53703 Ph: (608) 267-9323 Eml: tseytlinm@doj.state.wi.us

Counsel for Wisconsin

Nicholas J. Bronni Arkansas Deputy Solicitor General OFFICE OF THE ARKANSAS ATTORNEY GENERAL 323 Center Street, Suite 200 Little Rock, Arkansas 72201 Ph: (501) 682-6302 Eml: Nicholas.Bronni@arkansasag.gov

Counsel of Record for Plaintiff States in 220146



The Honorable Pierre N. Leval March 15, 2018 Page 3

Patrick K. Sweeten Senior Counsel for Civil Litigation Todd Lawrence Disher Special Counsel for Civil Litigation OFFICE OF THE ATTORNEY GENERAL OF TEXAS P.O. Box 12548 (MC 001) Austin, TX 78711-2548 Ph: (512) 463-4139 (512) 936-2266 Eml: Patrick.Sweeten@oag.texas.gov Todd.Disher@oag.texas.gov

Counsel for Texas

Aimee Feinberg Deputy Solicitor General Craig D. Rust Deputy Attorney General CALIFORNIA DEPARTMENT OF JUSTICE 1300 I Street Sacramento, CA 95814 Ph: (916) 322-0253 Eml: <u>Craig.Rust@doj.ca.gov</u>

Counsel for California