

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE: KATRINA CANAL BREACHES
CONSOLIDATED LITIGATION

CIVIL ACTION

NO. 05-4182 "K" (2)

PERTAINS TO: LEVEE, MRGO and BARGE

JUDGE DUVAL

MAG. WILKINSON

**DEFENDANTS' MOTION TO EXTEND
DEADLINE FOR ALL DOCUMENT PRODUCTION**

For the reasons set forth more fully in the accompanying memorandum, the Levee and MRGO defendants¹, hereby respectfully move the Court to extend the deadline in Levee, MRGO and Barge for all document production from the current deadline date of February 29, 2008, to a new deadline date to be established by the Court following an anticipated scheduling conference with the Court for the purpose of amending CMO No. 4 (governing the Levee and MRGO case

¹ Washington Group International, Inc. ("WGI"), which is a defendant in the MRGO and Barge case categories, is not joining in this Motion. However, counsel for WGI has advised undersigned counsel that WGI does not oppose the instant Motion. In addition, the Board of Commissioners of the Port of New Orleans, which, together with the United States and of America and the Orleans Levee District, is a defendant in the Barge case category, joins in this Motion.

categories) to coincide with the recently-amended deadlines in CMO No. 5 (governing the Barge case category).²

Dated: February 25, 2008

Respectfully submitted,

s/ Thomas P. Anzelmo

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² Defendants herein note that on February 13, 2008, WGI filed in the MRGO and Barge case categories an Ex Parte Motion for Scheduling Conference and/or to Amend Case Management Orders, requesting that the Court schedule such a scheduling conference. The Levee defendants anticipate filing a similar Motion in the next few days in the Levee case category.

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of February, 2008, a copy of the above and foregoing **Defendants' Motion to Extend Deadline for All Document Production** was filed electronically with the Clerk of Court using the Court's CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the Court's electronic filing system.

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