

**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

**EX PARTE MOTION FOR EXPEDITED HEARING ON DEFENDANTS'
MOTION TO EXTEND DEADLINE FOR ALL DOCUMENT PRODUCTION**

The Levee and MRGO defendants¹, through undersigned counsel, respectfully move for entry of an Order setting an expedited hearing on Defendants' Motion to Extend Deadline for All Document Production. The defendants herein respectfully submit that an expedited hearing is necessary in light of the current deadline of February 29, 2008 for all document production in the Levee, MRGO and BARGE case categories.

¹ As noted in Defendants' Motion to Extend Deadline for All Document Production, Washington Group International, Inc. ("WGI") is not joining in said Motion. However, counsel for WGI has advised undersigned counsel that WGI does not oppose said Motion. In addition, the Board of Commissioners of the Port of New Orleans, which, together with the United States of America and the Orleans Levee District, is a defendant in the Barge case category, joins in this Motion.

WHEREFORE, the defendants herein respectfully move for entry of an Order setting an expedited hearing on Defendants' Motion to Extend Deadline for All Document Production.

Dated: February 25, 2008

Respectfully submitted,

s/ Thomas P. Anzelmo

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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 ***Ex Parte* Motion for Expedited hearing on 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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