

## Matthew C. Blickensderfer

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June 12, 2019

## **ELECTRONICALLY FILED**

The Honorable Scott S. Harris Clerk of Court Supreme Court of the United States One First Street, N.E. Washington, DC 20543

Re: Case No. 18-1218 - Buchwald Capital Advisors LLC, Litigation Trustee to Greektown Litigation Trust v. Sault Ste. Marie Tribe of Chippewa Indians, et al.

Dear Mr. Harris:

On behalf of Respondents, Sault Ste. Marie Tribe of Chippewa Indians and Kewadin Casinos Gaming Authority, I request a thirty-day extension of time to and including July 19, 2019 to file a brief in opposition to the above-referenced Petition for a Writ of Certiorari. *See* Sup. Ct. R. 30.4. Respondents have received two prior thirty-day extensions. The purpose of this subsequent extension is to obtain approval of a signed settlement agreement by the bankruptcy court in which this case originated. Petitioner Buchwald Capital Advisors LLC consents to this request.

On March 18, 2019, Petitioner filed its Petition for Writ of Certiorari. The Petition was docketed on March 20, 2019. On March 29, 2019, Respondents moved for a thirty-day extension of their time to respond to the Petition. That motion was granted on April 2, 2019, making the response to the Petition due on or before May 20, 2019.

On May 7, 2019, Respondents moved for a second thirty-day extension of their time to respond to the Petition. That motion was granted on May 10, and the response to the Petition is currently due on or before June 19, 2019.

There is good cause for this extension because Petitioner and Respondents have executed a settlement agreement that would resolve this dispute and terminate this case. The settlement agreement requires the approval of the bankruptcy court in which this case originated. Petitioner moved the bankruptcy court for approval on June 6, 2019. The period for objecting to the motion for approval of the settlement agreement extends until July 1, 2019. If approved by the

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bankruptcy court, the settlement agreement requires the dismissal of this case once the approval becomes final and not subject to further appeal. If final approval of the settlement agreement is forthcoming, the parties therefore will eventually file an agreement under this Court's Rule 46 to dismiss this case.

Respondents respectfully requests another thirty-day extension of time to and including July 19, 2019.

Very truly yours,

/s/ Matthew C. Blickensderfer

Matthew C. Blickensderfer

cc: Michael K. Kellogg, Esq. Gregory G. Rapawy, Esq. Katherine C. Cooper, Esq. Linda M. Watson, Esq. Mark N. Parry, Esq.

## **CERTIFICATE OF SERVICE**

Pursuant to Supreme Court Rules 29.3 and 29.5(b), I, Matthew C. Blickensderfer, a member of the Bar of this Court, hereby certify that on this 12<sup>th</sup> day of June, 2019, a copy of the foregoing Request for Extension of Time to Respond to the Petition for a Writ of Certiorari was served by first-class U.S. Mail to counsel for the Petitioner:

Michael K. Kellogg, Esq. Gregory G. Rapawy, Esq. Katherine C. Cooper, Esq, KELLOGG HANSEN TODD FIGEL & FREDERICK PLLC 1615 M Street, N.W., Suite 400 Washington, DC 20036

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/s/ Matthew C. Blickensderfer
Matthew C. Blickensderfer

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