

SEWARD & KISSEL LLP

ONE BATTERY PARK PLAZA
NEW YORK, NEW YORK 10004

BRUCE G. PAULSEN
PARTNER
(212) 574-1533
paulsen@sewkis.com

TELEPHONE: (212) 574-1200
FACSIMILE: (212) 480-8421
WWW.SEWKIS.COM

901 K STREET, NW
WASHINGTON, DC 20001
TELEPHONE: (202) 737-8833
FACSIMILE: (202) 737-5184

May 15, 2019

VIA ECF AND FEDERAL EXPRESS

Supreme Court of the United States
1 First Street, NE
Washington, DC 20543
Attn: Scott S. Harris, Clerk of the Court

Re: *NuStar Energy Services, Inc. v. ING Bank N.V., et al.*
Petition for a Writ of Certiorari, Case No. 18-1211

Dear Mr. Harris:

We write on behalf of Respondent ING Bank N.V., as Security Agent (“ING”) in the above-referenced matter. On March 18, 2019, NuStar Energy Services, Inc. (“NuStar”) filed its petition for a writ of certiorari in this matter, and ING timely waived its right to respond. This Court subsequently requested a response from ING, which response is presently due on May 28, 2019.

Pursuant to Rule 30.4 of the Rules of this Court, ING respectfully requests a 27-day extension of time to and including June 24, 2019 within which to file a brief in opposition, due to counsel’s preexisting commitments and deadlines in other pending matters which justify an extension of time in this case, and in order to allow counsel to coordinate ING’s response in this matter with its response in Case No. 18-1224, which concerns a petition for certiorari filed by NuStar in response to opinions issued by the Second Circuit involving similar issues of law. Respondents Cosco Haifa Maritime Ltd., Cosco Auckland Maritime Ltd., Coscon and Cosco Venice Maritime Ltd join in this request.

Please let us know if you require any further information. We appreciate your time and assistance in this matter.

Respectfully submitted,


Bruce G. Paulsen

cc: Jonathan S. Franklin, Esq.; James L. Ross, Esq. (via Federal Express)