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February 10, 2020

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 30-day extension of time to and including March 19, 2020 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 six prior thirty-day extensions and two prior extensions for sixty days. The purpose of this subsequent extension is to obtain final approval of a signed settlement agreement by the bankruptcy court in which this case originated. Petitioner Buchwald Capital Advisors LLC consents to this extension.

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, 2019, making the response to the Petition due on or before June 19, 2019.

On June 12, 2019, Respondents moved for a third thirty-day extension of their time to respond to the Petition. That motion was granted on June 14, 2019, making the response to the Petition due on or before July 19, 2019.

On July 16, 2019, Respondents moved for a fourth thirty-day extension of their time to respond to the Petition. That motion was granted on July 18, 2019, making the response to the Petition due on or before August 19, 2019.

On August 13, 2019, Respondents moved for a sixty-day extension of their time to respond to the Petition. That motion was granted on August 15, 2019, making the response to the Petition due on or before October 18, 2019.

On October 9, 2019, Respondents moved for a thirty-day extension of their time to respond to the Petition. That motion was granted on October 11, 2019, making the response to the Petition due on or before November 18, 2019.

On November 14, 2019, Respondents moved for a thirty-day extension of their time to respond to the Petition. That motion was granted on November 18, 2019, making the response to the Petition due on or before December 18, 2019.

On December 12, 2019, Respondents moved for a sixty-day extension of their time to respond to the Petition. That motion was granted on December 16, 2019, and the response to the Petition is currently due on or before February 18, 2020.

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 bankruptcy court initially scheduled the hearing on approval for September 26, 2019, but then vacated that hearing date *sua sponte* and rescheduled it for October 17, 2019. The bankruptcy court subsequently vacated the new hearing date *sua sponte* and rescheduled it for November 21, 2019. At the hearing on November 21, 2019, which included other matters in the underlying cases, the bankruptcy court announced it would not take up the settlement approval issue at that time and set another hearing for January 16, 2020 at which the issue would be considered. At the January 16, 2020 hearing, the bankruptcy court judge verbally approved the settlement agreement. A written order of approval has not yet been entered, however, as counsel for the parties to this case are working on the language of the approval order with counsel for other parties to the bankruptcy court proceeding. Counsel anticipate the approval order being entered in the near future.

Once approved by the bankruptcy court, the settlement agreement requires the dismissal of this case once the approval becomes final and not subject to further appeal, which could occur as soon as 14 days after the entry of the approval order. Once final approval of the settlement agreement occurs and the approval is not subject to appeal, the parties will file an agreement under this Court's Rule 46 to dismiss this case.

Respondents respectfully requests a 30-day extension of time to and including March 19, 2020.

The Honorable Scott S. Harris

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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 10th day of February, 2020, 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:

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/s/ Matthew C. Blickensderfer
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