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March 17, 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 two-week extension of time to and including April 2, 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 seven prior thirty-day extensions and two prior extensions for sixty days. The bankruptcy court has now approved the settlement agreement between the parties. The purpose of this subsequent extension is to allow the appeal period to run for that approval order and then for the parties to dismiss this case under this Court's Rule 46. Counsel for Respondents has not yet been able to communicate with counsel for Petitioner Buchwald Capital Advisors LLC about this extension and will inform the Court once counsel have communicated; Petitioner has consented to the prior nine extensions.

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, making the response to the Petition due on or before February 18, 2020.

On February 10, 2020, Respondents moved for a thirty-day extension of their time to respond to the Petition. That motion was granted on February 12, 2020, and the response to the Petition is currently due on or before March 19, 2020.

There is good cause for this extension because the bankruptcy court approved the parties' settlement agreement on February 5, 2020. The settlement agreement was approved over a *pro se* objection, but the settlement agreement order was otherwise the product of negotiation and agreement among the parties and other active participants in the bankruptcy proceeding. The time for the objector to appeal the approval order to the district court expires on March 19, 2020, the same day on which Respondents' response to the Petition is currently due. Should the approval order become final and no longer appealable at the end of March 19, 2020, the parties will file an agreement under this Court's Rule 46 to dismiss this case.

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Respondents respectfully requests a two-week extension of time to and including April 2, 2020.

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 17th day of March, 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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