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August 29, 2025

By Overnight Mail and Electronic Filing

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

Re: *Delaware Trust Company v. Ad Hoc Group of Senior Secured
Noteholders and DIP Lenders et al.*,
No. 25-208

Dear Mr. Harris:

The Court docketed the petition for a writ of certiorari in the above-referenced case on August 18, 2025. The response is currently due on September 19, 2025.

In accordance with Supreme Court Rules 15.3 and 30.4, respondents respectfully request an extension of thirty days, until October 20, 2025, to file a brief in opposition. Petitioner consents to this request.

The extension of time is warranted in light of the press of other business for members of the core litigation team. Specifically, the litigation team has oral arguments in the Fifth Circuit on September 4, a motion to dismiss due in the Supreme Court of New York on September 19, and a reply brief due in the Second Circuit on September 30.

Sincerely,

/s/ Noel J. Francisco

Noel J. Francisco

*Counsel of Record for Ad Hoc Group of
Senior Secured Noteholders and DIP
Lenders*

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cc: John F. Bash
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