

3. The AIG Parties requested a 14-day the extension of the March 22, 2021 return date Solula specified for its motion directly from the Solula’s counsel, but the request was refused via email dated March 18, 2021.

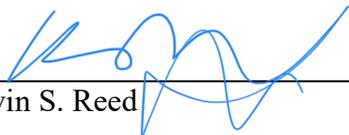
4. The issues presented by Solula’s Motion are important to the AIG Parties, especially since Solula seeks to file a brief in support of legal arguments that they have opposed through years of litigation in this Court, and in the trial court below.

5. The sought after adjournment will give us, and counsel for aligned parties in this matter, time to review Solula’s motion and respond appropriately. Obligations on other matters prevented us from doing so last week.

6. Granting a two week extension of time to respond to Solula’s Motion for permission to submit an amicus brief will not prejudice Solula. This appeal has not been calendared for argument, and the Court has not yet ruled on the litigants’ joint application for a three-part brief filing protocol that eliminated the need for cross-motions. Moreover, when asked if her client had a particular reason for refusing the requested adjournment of the return date, Solula’s counsel did not provide one but merely wrote, “Yes, we chose the 22nd [as a return date] for a reason. And of course, we also want the court to hear the motion as soon as possible.”

WHEREFORE, it is respectfully requested that the Institutional Investors’ application for an extension of time, in which the AIG Parties join, be granted.

Dated: New York, New York
March 22, 2021



Kevin S. Reed