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Via Fax Delivery

Honorable George B. Daniels USDJ
United States District Court
Southern District of New York
500 Pearl Street, Chambers
New York, NY 10007

Wednesday 31 January 2007

USDC SDNY	19
ADJUTANT	
MECHANICALLY FILED	
DATE FILED:	FEB 06 2007

*Re: Ass'n for Restitution of Polish Assets and Property et al v. Republic of Poland et al;
06-CV-7725 (GBD)*

Honorable Judge:

I write this letter on behalf of plaintiffs to request a brief adjournment of the date within which plaintiffs response to defendant's pending Motion to Dismiss.

This request is necessitated because the computer on which all my research, files and documents related to this case are stored has malfunctioned and has had to be be shipped for service. I am told that it will take between 10 – 21 days for the computer to be returned and even then, there is no certainty that the research and documents which are stored in both Word, RichText, PDF and JPEG format will be retrievable or usable. *Note: A copy of Jan. 29, 2007 Computer record is attached for the Court's consideration.*

To expedite the process of preparing Plaintiffs' response I will be traveling to Europe in the coming weeks to meet the researchers, clients and other witnesses in Warsaw and Germany who will be helping me prepare the response and in the duplication of the files, documents and research that is now inaccessible due to my computer malfunction.

Accordingly, I respectfully request an adjournment until March 2, 2007 with which to file Plaintiffs' response to the pending Motion and proposed Amended Complaint. Defendants should also be granted an equal extension of time and a copy of this letter is being provided to them contemporaneous with its transmission to the Court.

Thank you in advance for the Court's consideration.

SO ORDERED

Respectfully submitted,


Edward D. Fagan



attachment – Best Buy Record of Computer Problem – 1 page

HON. GEORGE B. DANIELS

Ccs: Counsel for Citibank and Fleet Boston

FEB 06 2007

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