

for Improper Venue” (Doc. 15) (“JPMC’s Motion to Transfer”), and a “Motion to Dismiss for Lack of Personal Jurisdiction” (“JPMC’s Motion to Dismiss”) (Doc. 19). The Plaintiffs’ responses to these motions are due on June 1, 2009.

As noted in a previous motion to the Court by the FDIC (Doc. 13 – “FDIC’s Unopposed Motion Of Intervenor-Defendant FDIC-Receiver For Leave To File Reply To Plaintiffs’ Response To Intervenor’s Motion To Transfer Or Dismiss For Improper Venue,” p. 2) (“FDIC’s Motion for Leave”), the arguments and issues relating to venue transfer substantially overlap with those asserted with regard to the question of remand. The Court granted the FDIC’s Motion for Leave on April 30, 2009 (Doc. 14).

Similarly, the arguments and issues relating to JPMC’s Motion to Dismiss substantially relate to and overlap those raised in Plaintiffs’ Motion for Remand and JPMC’s response thereto. See Motion for Remand, pp. 24-25. In addition, JPMC states that it filed its Motion to Dismiss partially “in support of its opposition to plaintiffs’ motion to remand.” See JPMC’s Motion to Dismiss, footnote 1.

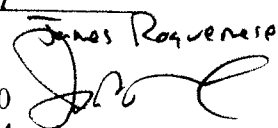
Because of the interrelated nature of JPMC’s and the FDIC’s arguments, and in order to provide the Court with both sides of those arguments in considering JPMC’s Motion to Transfer and JPMC’s Motion to Dismiss, the Plaintiffs respectfully request leave of the Court to file a short reply in further support of its Motion for Remand concurrently with the filing their responses to JPMC’s Motion to Transfer and JPMC’s Motion to Dismiss, which are due no later than June 1, 2009.

For the foregoing reasons, the Plaintiffs respectfully request that this Motion be granted, and that the Plaintiffs have up to and including June 1, 2009 to file a Reply to JPMC’s and FDIC’s responses to Plaintiffs’ Motion for Remand.

GREER, HERZ & ADAMS, L.L.P.

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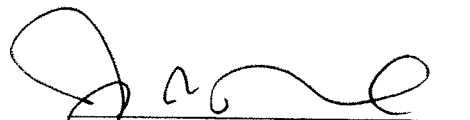
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule of the United States District Court for the Southern District of Texas 7.2, I certify that I have conferred with counsel for the FDIC and counsel for the JPMorgan Chase defendants and that the foregoing motion is unopposed.


James M. Roquemore

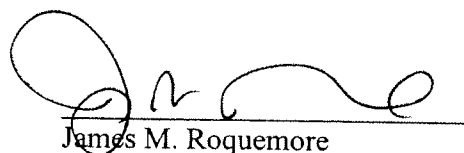
CERTIFICATE OF SERVICE

I certify that on this 18th day of May, 2009, a true and correct copy of the foregoing document was filed with the Court's ECT filing system, which will provide electronic notification of its filing to all counsel who have appeared in this action, including the following counsel of record:

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