



Phillips Lytle LLP

VIA CM/ECF
Hon. Gary L. Sharpe
United States District Court
Northern District of New York
United States Courthouse
445 Broadway
Albany, NY 12207

February 20, 2016

Re: Securities and Exchange Commission vs. McGinn, Smith & Co., Inc., et al.
Case No. 1:10-cv-00457-GLS-CFH
Bonnie Golub Letters Requesting Extension of Time to file Response to Receiver's
Plan Motion

Dear Judge Sharpe:

I am writing in respect of the letters of Bonnie Golub, Esq. filed at Docket Nos. 861 and 872.


Ms. Golub did not confer with me with respect to her requests, and I can find no ruling by the Court as to her letter request at Docket No. 861 for an extension of time. Her letter filed yesterday afternoon at Docket No. 872 presumes that she will have additional time beyond the February 16, 2016 deadline to file a complete Objection to the Receiver's Plan. She proposes a date of Wednesday, February 24. If the Receiver is to adequately understand and respond to Ms. Golub's Objection, it should be the complete Objection, not a redacted version or incomplete version.

I will be traveling to London on February 24, 2016 on a long planned trip to visit my daughter and will be returning to the United States on the evening of March 3, 2016. Accordingly, since the Objection filed by Ms. Golub at Docket No. 862 is incomplete, the Receiver respectfully requests the Court to adjust the Briefing Schedule at Docket No. 851 to allow the Receiver until March 9, 2016 to file his Omnibus Reply to the Plan Objections.

I am available to confer over the weekend or any time Monday if the Court so requests. Thank you.

Very truly yours,

Phillips Lytle LLP

By 

William J. Brown

EEEht
Doc #01-2915859.1

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cc:

Bonnie Golub, Esq.
David Stoelting, Esq.
Kevin McGrath, Esq.
Sheldon L. Solow, Esq.
Bryan M. Westhoff, Esq.

SO ORDERED:

U.S. District Judge

Date: February 23, 2016