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The Chrysler Building
405 Lexington Avenue | New York, NY 10174-0208
blankrome.com

Phone: (212) 885-5270

Fax: (917) 332-3795

Email: tbelknap@blankrome.com

March 27, 2018

BY ECF

Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007-1312

Re: In re Energetic Tank, Inc.
S.D.N.Y. Docket No. 1:18-cv-01359-PAC
Our Ref.: 693379-06505

Dear Judge Crotty:

We are attorneys for Plaintiff Energetic Tank, Inc., owner of the M/V ALNIC MC (“Owner”), in the referenced matter. We write to request that the Court extend the deadline for the crew members and families of deceased crew members of the USS JOHN S. MCCAIN to file claims by sixty days from April 16, 2018 to June 15, 2018. There have been no prior requests for extensions.

To supplement the notice requirements of Rule F (4) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, the U.S. Navy has voluntarily undertaken to arrange to provide the Notice of Complaint for Exoneration from or Limitation of Liability to the service members on board the USS JOHN S. MCCAIN at the time of the collision and the families of the service members who died as a result. That process may not be completed prior to the presently scheduled claims deadline. In the interests of fairness to the crew members and families involved and judicial efficiency, Owner requests that the claims deadline be extended.

Counsel for all claimants who presently have filed claims does not object to this request.

Respectfully submitted,

/s/ Thomas H. Belknap, Jr.

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March 27, 2018

Page 2

cc: By ECF

Jacob Shisha, Esq.
Tabak, Mellusi & Shisha LLP
Attorneys for Claimants Ramdhun and Luangco