

comprehensive Case Management Order that establishes a briefing schedule for all motions, and that takes account of the logistical and procedural issues posed by this and other Enron-related cases. As Defendant establishes in the Motion, this relief is warranted in light of the unique circumstances of this case, including the multitude of cases that have been filed over the last several weeks relating to the recent events involving Enron Corporation, and the complex preliminary procedural and logistical challenges presented by this and other Enron-related cases.

2. Defendant requests that the Court give expeditious consideration to the Motion. If the Court were to apply the usual response time and reply time to Defendant's Motion, it would not be ready for a ruling until after the scheduled time for Defendant to answer Plaintiff's Complaint. Due to the pending answer deadline, Defendant fears that a delay in the resolution of its Motion could potentially preclude Defendant from having sufficient time to thoroughly investigate the allegations of Plaintiff's Complaint and fully answer or otherwise respond to the allegations contained therein. Accordingly, it is in the interest of justice for the Court to expedite its consideration of the Motion.

3. Furthermore, to allow meaningful resolution of the Motion, Defendant requests that he be granted an extension of time to answer, move to dismiss, or otherwise respond to Plaintiff's Complaint during the pendency of this Motion.

WHEREFORE, Defendant respectfully requests that the Court expedite its consideration of Defendants Kenneth L. Lay's Unopposed Motion for Enlargement of Time to Answer, Move to Dismiss or Otherwise Respond to Plaintiff's Complaint, and the Court grant Defendant such other and further relief as is just and proper.

Respectfully submitted,

James E. Coleman, Jr. *by permission*

James E. Coleman, Jr.

State Bar No. 0457400

Southern District ID No. 04574000

CARRINGTON, COLEMAN, SLOMAN
& BLUMENTHAL, L.L.P.

200 Crescent Court, Suite 1500

Dallas, Texas 75201

(214) 855-3000 (telephone)

(214) 855-1333 (telecopy)

ATTORNEY IN CHARGE FOR
DEFENDANT KENNETH L. LAY

OF COUNSEL:

Ken Carroll

State Bar No. 03888500

Southern District ID No. 20110

Diane M. Sumoski

State Bar No. 19511000

Southern District ID No. 14847

Carrington, Coleman, Sloman & Blumenthal, L.L.P.

200 Crescent Court, Suite 1500

Dallas, Texas 75201

(214) 855-3000 (telephone)

(214) 855-1333 (telecopy)

Charles F. Richards, Jr.

Richards, Layton & Finger P.A.

One Rodney Square,

P.O. Box 551

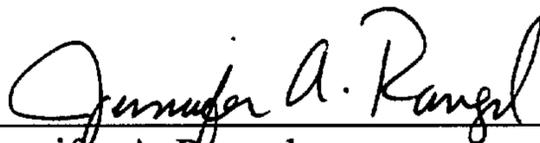
Wilmington, Delaware 19899

(302) 651-7738 (telephone)

(302) 784-7014 (telecopy)

CERTIFICATE OF CONFERENCE

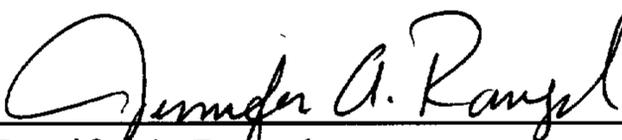
On December 6, 2001, the undersigned counsel for Defendant Lay conferred with counsel for Plaintiff on the merits regarding the foregoing motion. Plaintiff's counsel agreed to the relief sought herein.



Jennifer A. Rangel

CERTIFICATE OF SERVICE

A true and correct copy of this motion was served on counsel of record by regular mail on December 7, 2001.



Jennifer A. Rangel